

- REQUEST: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the Interrogatory with which that person assisted.
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 1 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 1 in Georgia Public Service Commission Docket No. 8354-U.

REQUEST: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about and responsible for implementing the change control processes used to manage changes made to interfaces and processes provided to Competitive Local Exchange Carriers ("CLECs").

RESPONSE: William N. Stacy  
Network Vice President, Interconnection Services  
4410, 675 West Peachtree Street  
Atlanta, Georgia 30375

Ronald M. Pate  
Director, Interconnection Services  
3J39, 675 West Peachtree Street  
Atlanta, Georgia 30375

Valerie Cottingham  
Sales Director, Interconnection Services  
8<sup>th</sup> Floor, 600 19<sup>th</sup> Street  
Birmingham, Alabama 35203

REQUEST: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about and responsible for implementing the OSS functionality provided to BellSouth's retail operation in comparison to that which is provided to CLECs, including certain issues pending in the change control process, such as:

- a) the provision of parsed customer service records for pre-ordering;
- b) the provision of the ability to submit orders electronically for all services and elements; and
- c) the provision of electronic processing after electronic ordering, without subsequent manual processing by BellSouth personnel.

RESPONSE: William N. Stacy  
Network Vice President, Interconnection Services  
4410, 675 West Peachtree Street  
Atlanta, Georgia 30375

and

Ronald M. Pate  
Director, Interconnection Services  
3J39, 675 West Peachtree Street  
Atlanta, Georgia 30375

**REQUEST:** Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about the responsible for implementing the change control processes used to manage changes made to interfaces and processes used in BellSouth's retail operations.

**RESPONSE:** BellSouth Business Systems:  
Melaine S. Hardwick  
Director  
3 Floor, 1277 Lenox Park Blvd  
Atlanta, GA 30319

Bryan Estes  
Group Leader, Anderson Consulting  
Suite 500, 2835 Brandywine Rd  
Atlanta, GA 30341

REQUEST: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about BellSouth's ability to provide a full function, machine-to-machine, maintenance and repair interface that is capable of integration by CLECs.

RESPONSE: Ronald M. Pate  
Director, Interconnection Services  
3J39, 675 West Peachtree Street  
Atlanta, Georgia 30375

- REQUEST: Please identify all individuals involved in the tasks listed below, and describe the nature and time period of each individual's involvement in that task. Please provide the information organized in response to the following subparts and indicate which individual is best able to provide information on the details of the topic referenced in the subpart.
- (a) Negotiations surrounding the initial engagement of KCI for third-party testing of OSS in Georgia and any subsequent engagement between BellSouth ("BellSouth") and KCI;
  - (b) the drafting or revision of any and all fee arrangements or contracts for hire that reflect an agreement for Georgia OSS Test work performed by KCI, by version;
  - (c) the development, review and/or revision of the Georgia and Florida OSS Tests Master Test Plans including any supplemental test plans, by version, including decisions regarding the scope of the Georgia and Florida OSS Tests;
  - (d) the implementation of the Georgia and Florida OSS Test Master Test Plans including all supplemental test plans;
  - (e) the collection or reporting of data or supporting information under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;
  - (f) for each test domain, the identification of exceptions under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;
  - (g) for each exception report, the resolution or closure of exceptions under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;
  - (h) the drafting and revision of the Georgia OSS Test Master Test Plan Final Report and the Supplemental Test Plan Final Report.
  - (i) the existence and extent of competition for local service in Kentucky

BellSouth Telecommunications, Inc.  
Kentucky Public Service Commission  
Case No. 2001-105  
AT&T's 1st Interrogatories  
July 16, 2001  
Item No. 6  
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RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 7 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 2 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please identify each meeting and telephone call among or between BellSouth, KCI, and/or representatives of the GPSC, whether or not the meeting and telephone call was attended by others, and for each meeting and telephone call, identify both the invited persons and the attendees, and describe the purpose of the meeting and telephone call. Please indicate which of the meetings and telephone calls were regularly scheduled meetings and telephone calls set by a published schedule. Please identify all documents referred to and all persons consulted to develop the response to this Interrogatory.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 6 in Georgia Public Service Commission Docket No. 8354-U.

REQUEST: Please identify the participants in each of the weekly conference calls referenced in the Georgia Status Reports.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 8 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please identify all individuals who drafted or revised all plans or reports submitted to the GPSC during the course of the Georgia OSS Test and for each, identify the report drafted or revised.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 9 in Georgia Public Service Commission Docket No. 8354-U.

- REQUEST:** Please identify all individuals who drafted or revised all documents, plans or reports submitted to the FPSC during the course of the Florida OSS Test (beginning with the creation of the Master Test Plan and all periods thereafter) and for each, identify the report drafted or revised.
- RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 11 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please describe the policies and procedures KCI employed in the Georgia and Florida OSS Tests, identify any input by BellSouth as to the policies and procedures and specify the ways in which these policies and procedures differ, if any, from Generally Accepted Auditing Principles and/or standards promulgated by the American Institute of Certified Public Accountants.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 12 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 10 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please identify all of the differences between the procedures, testing, monitoring and reporting KCI has used and is using in the Georgia OSS Test and the procedures used in a review or test of BellSouth's Operational Support Systems in other states, including, but not limited to Florida. Please explain how these differences relate to data reporting and test results.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 13 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 11 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please identify all electronic, telephonic or other communication received from any third party, including CLECs, regarding exceptions, conduct, scope, assumptions, problems, deficiencies, concerns, or any other issues related to the Georgia and Florida OSS Tests. For each communication, please describe how the third party communication was processed, to whom the information was disseminated, and any resulting action.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 14 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 14 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please describe the process by which the Georgia OSS Test Master Test Plan was developed. Please identify and describe each revision to the Master Test Plan and for each describe the date of the revision, the basis for the revision, and the impact of the revision on the Georgia OSS Test.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 16 in Georgia Public Service Commission Docket No. 8354-U.

- REQUEST: Please identify and describe the standard, if any, for military testing used in designing the Georgia and Florida OSS Tests, including, but not limited to, any differences between the two tests.
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 16 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 18 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** The Georgia Master Test Report states at Page II-6 that “[i]n a military style test, a mindset of ‘test until you pass’ was generally adopted.” Please identify all of the tests in the Georgia OSS Test in which KCI deviated from military testing and, for each test, explain the basis for the deviation.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 19 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please describe the methodology used to select sample sizes in the Georgia and Florida OSS Tests for each test by individual test or, if appropriate, by groups of tests, and identify the individuals responsible for developing and implementing that methodology.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 18 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 20 (1<sup>st</sup> and Supplemental Responses) in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** For the Georgia OSS Test, please identify each test for which sample size or methodology was changed during any retest and describe the basis for each change. For each change, please identify the individuals involved in determining that the change should be made, their qualifications for making that determination, the standard and/or methodology they applied, and the factors that informed their decision.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 21 (1<sup>st</sup> and Supplemental Responses) in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** For the Georgia and Florida OSS Tests, please identify all exceptions for which further testing was conducted after issuance of the closure report and describe the nature and results of that testing.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 20 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 22 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** For the Georgia and Florida OSS Tests, please identify all exceptions that were closed based upon proposed fixes. For each exception, please identify the individuals involved in determining the exception should be closed, their qualifications for making that determination, the standards they applied, the criteria established for retest, and the basis upon which they accepted a proposed fix rather than requiring the fix to be implemented and tested.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 21 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 23 (1<sup>st</sup> and Supplemental Responses) in Georgia Public Service Commission Docket No. 8354-U.

- REQUEST:** Please identify all tests which were considered for inclusion in the Georgia and Florida OSS Tests. For each test in each state, please identify the basis upon which the decision to include or exclude the test was made. Please also identify all individuals involved in making the decision for each test and describe the standards they applied.
- RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 22 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 24 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please provide the definition and meaning of the phrase “no adverse impact on competition” as it is used in the Georgia OSS Test and explain how it relates to test results, as well as identify the individuals involved in making that determination, their qualifications for making that determination, the standard and/or methodology they applied, and the factors that informed their decision.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 27 in Georgia Public Service Commission Docket No. 8354-U.

REQUEST: Please describe all parameters of each test bed account in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 24 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 31 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please explain whether any test results, including but not limited to results from work done prior to September 9, 1999, were excluded from the Georgia OSS Test Final Report. If so, identify and describe the excluded data and for each item describe why it was excluded.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 32 in Georgia Public Service Commission Docket No. 8354-U.

- REQUEST: For each "draft exception" report that was withdrawn in the Georgia OSS Test, please identify the individuals involved in making the withdrawal determination, their qualifications for making that determination, the standard they applied, and the factors that informed their decision.
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 33 (1<sup>st</sup> and Supplemental Responses) in Georgia Public Service Commission Docket No. 8354-U.

- REQUEST:** For the Georgia and Florida OSS Tests, please identify each test in which KCI acted as if it were a CLEC. For each of these tests, please specify whether KCI was identifiable to BellSouth.
- RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 27 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 34 (1<sup>st</sup> and Supplemental Responses) in Georgia Public Service Commission Docket No. 8354-U.

REQUEST: Please describe the process by which volume testing for capacity management testing was conducted in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 28 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 36 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please identify all order types that are designed to fall out of the mechanized order process in the Georgia and Florida OSS Tests. For each order type, describe the basis for the design choice.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 37 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** In connection with the Georgia and Florida OSS Tests, please describe the standard against which KCI evaluated BellSouth's change management process and the basis for the choice of that standard.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 31 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 39 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please describe any CLEC interviews conducted as part of the Georgia OSS Test, including but not limited to an identification of the CLECs interviewed, a description of the subjects discussed, and the use made of the information gathered during those interviews.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 40 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 45 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please describe any CLEC interviews conducted as part of the Florida OSS Test, including, but not limited to, an identification of the CLECs interviewed, a description of the subjects discussed, and the use made of the information gathered during those interviews.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 33 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please describe the information available to Hewlett Packard ("HP") for purposes of constructing the TAG and EDI interfaces for the Georgia OSS Test. Did HP rely solely on this information or did it receive assistance? If HP received assistance, please identify the source and extent of the assistance.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 40 in Georgia Public Service Commission Docket No. 8354-U.

REQUEST: Please describe all communications between BellSouth and HP in connection with the Georgia OSS Test.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 35 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please describe the information available to KCI for purposes of constructing the TAG and EDI interfaces for the Florida OSS Test. Did KCI rely solely on this information or did it receive assistance? If KCI received assistance, please identify the source and extent of the assistance.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 36 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: For the Georgia and Florida OSS Tests, please identify the types of directory listings tested for: (a) unbundled network element loop orders; and (b) loop/port orders.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 37 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 42 in Georgia Public Service Commission Docket No. 8354-U.

REQUEST: Please provide the definition and meaning of the term "parity" as it is used in the Georgia and Florida OSS Tests and explain how it relates to data reporting and results.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 38 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 43 in Georgia Public Service Commission Docket No. 8354-U.

REQUEST: Please identify by test activity all BellSouth retail operations used for purposes of assessing parity in the Georgia and Florida OSS Tests.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 39 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 44 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please provide the definition and meaning of the phrase "retail analog" as it is used in the Georgia and Florida OSS Tests and explain how it relates to data reporting and results.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 40 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 45 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please identify all CLEC operations in Georgia and Florida for which BellSouth contends there is no retail analog for purposes of assessing parity and describe the basis for the contention.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 41 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 46 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** In connection with the Georgia OSS Test, please provide the definition and meaning of the phrase "original source" as it is used on page 22 of the Flow-Through Evaluation Report.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 49 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** In connection with the Georgia and Florida OSS Tests, were any data regarding CLECs' use of BellSouth's OSS analyzed and compared with any test results with actual CLEC results? If so, please describe such analysis and comparison, the individuals performing the analysis and comparison, and their conclusions. If not, please explain and provide the basis for the decision not to make reference to actual CLEC data and identify the individuals involved in making that decision.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 43 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 50 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Did BellSouth ever provide KCI data or information from the AT&T Georgia 1000 Test of BellSouth provision of unbundled network element platform ("UNE-P")? If so, describe any use KCI made of that data or information.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 51 in Georgia Public Service Commission Docket No. 8354-U.

**REQUEST:** Please explain why the Georgia OSS Test was terminated and identify the individuals involved in requesting, considering, and approving the termination of the Test.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 53 in Georgia Public Service Commission Docket No. 8354-U.

REQUEST: For the Georgia OSS Test, please identify the "five active issues" contained in KCI's Documentation Issues Log as reported in the Interim Status Report of January 26, 2001.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 57 (1<sup>st</sup> and Supplemental Responses) in Georgia Public Service Commission Docket No. 8354-U.

REQUEST: Please identify and describe all exceptions, exception amendments, exception responses, and exception closures issued since the submission of the Georgia Final Report on March 20, 2001.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 58 (1<sup>st</sup> and Supplemental Responses) in Georgia Public Service Commission Docket No. 8354-U.

REQUEST: For the Georgia and Florida OSS Tests, please identify and describe all pending exceptions, exception amendments, exception responses, and exception closures still outstanding as of the date of your answer.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 48 in North Carolina Utilities Commission Docket P-55, Sub 1022 and Item 59 (1<sup>st</sup> and Supplemental Responses) in Georgia Public Service Commission Docket No. 8354-U.

REQUEST: Please provide intervals for:

- a) BellSouth PMAP help desk to provide answers to CLEC questions;
- b) Account Team members to provide an explanation to CLEC inquiries regarding their performance measures reports and/or raw data; and
- c) Performance measurement personnel to provide an explanation to CLEC inquiries regarding their performance measure reports and/or raw data.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 49 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: For each and every BellSouth SQM measure, please provide a list of:

- a) all data included in the Legacy systems but excluded from the ICAS or BARNEY data warehouse;
- b) all data included in the Legacy systems but excluded from the "Snapshot" database; and
- c) all data included in the ICAIS and "Snapshot" database, but excluded from the PMAP "raw data files" posted on BellSouth's PMAP web-site.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 50 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please describe all types of data included in the denominator of the Percent Rejected Service Requests-- total mechanized measure and all data included "Total Mech. LSRs" section in the Flow-Through Report and any differences between these data sets.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 51 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please describe all types of data included in the LSRs in the fully mechanized Reject Interval measure and all data included in the LSRS in the auto-clarification section of the Flow-Through Report and explain any differences between these data sets.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 52 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please describe all types of data included in the partially mechanized Reject Interval Measure and all the data included in the "CLEC Caused Fallout" section of the Flow-Through Report and explain any differences between these data sets.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 53 in North Carolina Utilities Commission Docket P-55, Sub 1022.

- REQUEST: Please describe all types of data included in the fully mechanized Firm Order Confirmation Measure and all data included in the "Issued Service Orders" section of the Flow-Through Report and explain any differences between these data sets.
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 54 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please describe all types of data included in the completed orders used in the calculation of the missed appointment measure for Kentucky and all types of data included in the completed orders used in the calculation of the completion notice measure for Kentucky and explain any differences between these data sets.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 55 in North Carolina Utilities Commission Docket P-55, Sub 1022.

- REQUEST: Please describe all types of data included in the completed orders used in the calculation of the Missed Appointments –LNP measure for Kentucky and all types of data included in the completed orders used in LNP Disconnect Timeliness Measure for Kentucky and explain any differences between these data sets.
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 56 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For each SQM measure, please describe the source of the data used to calculate the performance measurement results, e.g. LESOG, SOCs, and others.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Items 49 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For each measure for which data is available in the Legacy system, describe the data that is stored or otherwise placed in BARNEY. If data for a measure is not stored or otherwise placed in BARNEY, please identify the database or system where such information is stored or otherwise placed.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 58 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: For each of the following, please state the date by which BellSouth will provide CLEC's in Kentucky with the following:

- a) raw data for LNP measures;
- b) raw data for billing measures; and
- c) PON specific raw data for the Coordinated Customer Conversions-Hot Cut Timeliness % within Interval measure.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 59 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Identify the name, title, and business address of one or more subject matter experts, officers, directors, managing agents, or other person(s) most knowledgeable about and responsible for managing and implementing the electronic and manual interfaces available to CLECs for accessing BellSouth's OSS.

RESPONSE: William N. Stacy  
Network Vice President, Interconnection Services  
4410, 675 West Peachtree Street  
Atlanta, Georgia 30375

Ronald M. Pate  
Director, Interconnection Services  
3J39, 675 West Peachtree Street  
Atlanta, Georgia 30375

Trip Agerton  
Operations Vice-President, Network and Carrier Services-Customer Services  
4417, 675 West Peachtree Street  
Atlanta, Georgia 30375

Kenneth Ainsworth  
Director, Interconnection Operations-Staff  
29A51, 675 West Peachtree Street  
Atlanta, Georgia 30375

Dennis Davis  
Director, Network and Carrier Services-Information Technologies  
19U85, 675 West Peachtree Street  
Atlanta, Georgia 30375

**REQUEST:** Describe in detail the methodology utilized by BellSouth to calculate the "Percent Flow-through Service Requests Report" and "LNP Percent Flow-through Service Requests Report" for service requests submitted on or after January 1, 2000, including a description of any changes to that methodology that have been implemented since that date. Include descriptions for all sub-sections of each report (Summary, Detail, Residence Detail, Business Detail, UNE Detail, Flow-through Error Analysis, LNP Summary, and LNP Aggregate Detail).

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 61 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Describe in detail the errors that resulted in BellSouth re-issuing the entire January 2000 Flow-Through Report, including a description of the errors, how they were caused, how they were corrected and what steps were taken to insure that the same errors will not be made in future reports.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 62 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Describe in detail the errors that resulted in BellSouth re-issuing the February 2000 Local Number Portability Flow-Through Report, including a description of the errors, how they were caused, how they were corrected and what steps were taken to insure that the same errors will not be made in future reports.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 63 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Describe in detail any errors in the BellSouth October 2000 Flow-Through Report provided to KMPG for validation in the Georgia and Florida Third-Party Tests that caused that report to be different from the official reports filed with the Georgia and Alabama Public Service Commissions.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 64 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please describe in detail the methodology utilized by BellSouth to calculate the "Percent Flow-through Service Requests" for BellSouth's retail operations. Provide the methodology for requests placed using the Regional Negotiation System (RNS) and using the Regional Ordering System (ROS).

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 65 in North Carolina Utilities Commission Docket P-55, Sub 1022.





REQUEST: (continued)

- c) the volume of LSRs that fall out due to BellSouth errors (“BST Caused Fallout”) and the volume of service orders (SOs) that result.

**Month / Year**

**Local Service Requests Encountering BST Caused Fallout (BST Error)**

<b>Product Group</b>	LNP		UNE		Business		Residence		Total	
	BST Error	SO								
<b>Interface</b>										
TAG										
EDI										
LENS										
<b>Total</b>										

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 29 and Revised 29 in North Carolina Utilities Docket P-140, Sub 73.

**REQUEST:** For each month beginning January 1999 through the most current month, across all nine BellSouth states and specifically for Kentucky, identify the volume of BellSouth service requests for retail local exchange services and the volume of service orders (SOs) subsequently issued.

**Month / Year**

**Service Requests for Local Exchange Service and Service Order Volume**

<b>Product Group</b>	<b>Business</b>		<b>Residence</b>		<b>Total</b>	
	Requests	SO	Requests	SO	Requests	SO
<b>Interface</b>						
RNS						
DOE						
SONGS						
ROS						
<b>Total</b>						

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 67 in North Carolina Utilities Commission Docket P-55, Sub 1022, plus the following updated information.

**2001 ROS Orders**

**ALABAMA**

MM/YYYY	Issued/ Held	Updated	Total
<u>06/2001</u>	23,226	11,293	34,519

**FLORIDA**

<u>06/2001</u>	83,536	28,551	112,087
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**GEORGIA**

<u>06/2001</u>	55,797	11,970	67,767
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**KENTUCKY**

<u>06/2001</u>	14,066	2,255	16,321
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**LOUISIANA**

<u>06/2001</u>	27,128	11,610	38,738
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**MISSISSIPPI**

<u>06/2001</u>	10,718	6,106	16,824
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**NORTH CAROLINA**

<u>06/2001</u>	23,274	6,602	29,876
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**SOUTH CAROLINA**

<u>06/2001</u>	18,213	8,301	26,514
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**TENNESSEE**

<u>06/2001</u>	25,760	7,804	33,564
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**TOTAL**

<u>06/2001</u>	281,718	94,492	376,210
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REQUEST: For each month beginning January 1999 through the most current month, across all nine BellSouth states and specifically for Kentucky, identify the volume of BellSouth employee input errors ("IE") and BellSouth System Caused Fallout ("BST Errors") occurring in each month.

**Month / Year**

**Service Requests for Local Exchange Service and Service Order Volume**

<b>Product Group</b>	Business		Residence		Total	
	IE	BST Error	IE	BST Error	IE	BST Error
<b>Interface</b>						
RNS						
DOE						
SONGS						
ROS						
Total						

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 68 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For each month beginning January 2000 through the latest reported month, across all nine BellSouth states and specifically for Kentucky, identify the volume of BellSouth employee input service requests that failed to be accepted by SOCS as valid service orders and thus did not reach assignable order ("AO") status.

**Month / Year**

**Service Requests for Local Exchange Service Failing to Reach AO Status**

<b>Product Group</b>	<b>Business</b>	<b>Residence</b>	<b>Total</b>
<b>Interface</b>			
RNS			
DOE			
SONGS			
ROS			
<b>Total</b>			

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 68 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For each type of resale service, UNE, requisition, activity, or circumstance (e.g., more than 25 lines, populated project or RPON fields, expedites, etc.) that falls out for manual processing by design, please identify the monthly volume of each type for the latest 3 months, and reason why BellSouth designed such LSRs to fall out to manual processing. Provided below is a sample format.

**Designed Manual Fallout Distribution**

Type	March	April	May	Reason for Fall Out
LNP with Complex Listing				e.g., complexity
Basic Rate ISDN				e.g., low volumes
LSRs Expedited by CLEC				

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 70 and Item 70 Attachment in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please describe in detail the modifications that were required or made to the Direct Order Entry ("DOE") and Service Order Negotiation System ("SONGS") marketing and sales ordering systems to allow them to be used by BellSouth personnel in the LCSC to order unbundled network elements.

**RESPONSE:** See BellSouth's response to Item No. 41 in AT&T's 3rd Set of Data Requests in the Florida 271 docket. There have been no modifications to DOE or SONGS for the issuance of UNEs by BellSouth personnel in the LCSC.

REQUEST: Please describe whether electronic mechanization is affecting LCSC volumes and staffing and:

- a. List each of the order types processed by the LCSC;
- b. Provide the "standard work times" associated with each order type;
- c. Provide the definition, including the duration (in minutes or seconds) of a "Standard Work Unit".

RESPONSE: Please refer to the response to AT&T's Request for Production of Documents, Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Describe in detail the capabilities of the new Regional Ordering System ("ROS") that BellSouth developed for its internal use to replace DOE and SONGS.

**RESPONSE:** This was previously responded to 5/17/00, as Interrogatory No. 8 in AT&T's 1st Set of Interrogatories in North Carolina Docket P-140, SUB 73. As an update; ROS is a service order entry system utilized by BellSouth's small business and large business operations units for service order issuance into SOCS. The ROS application interfaces with the same BellSouth's internal OSS' as the CLEC's interfaces to perform pre-ordering and ordering functionalities. The ROS application is composed of a series of windows that allows the customer service representative to create, view, and edit a service request in a logical task oriented manner. The ROS application gave small and large business a regional application versus DOE/SONGS which is state specific.

REQUEST: Compare and contrast ROS capabilities with the capabilities of the existing Regional Negotiation System ("RNS"), the DOE system, and the SONGS system.

RESPONSE: See previous response in Interrogatory 8 in AT&T's 1st Set of Interrogatories in North Carolina Docket P-140, SUB 73, dated 5/17/00. As an update, please see the table below comparing Product/Services that can be processed in each interface.

<b>Products/Services</b>	<b>DOE</b>	<b>RNS</b>	<b>ROS</b>
Centrex	Yes	No	No
ACD (Automatic Call Distributor)	Yes	No	No
Data switching	Yes	No	Yes
Frame relay services	Yes	No	Yes
Basic Rate ISDN	Yes	No	Yes
Primary Rate ISDN	Yes	No	Yes
Dialing parity	Yes	Yes	Yes
Voice service	Yes	Yes	Yes
Fax transmissions	No	No	No
Operator Services(OLNS)	Yes	Not applicable, Wholesale product	Not applicable, Wholesale product
Switched digital data services	Yes	No	Yes
Non-switched digital data services	Yes	No	Yes
Video Services	No	No	No
Coin Services	Yes	No	No
ATM	No	No	No
Private line services (Simple residential or business service)	Yes	Yes	Yes

REQUEST: Provide the following information related to the transition from DOE and SONGS to ROS that was completed in the fourth quarter 1999.

- (a) For each month of the transition, provide the number and percentage and cumulative number and percentage of BellSouth Retail Business Unit service representatives transitioned to the new ROS system.
- (b) For each month of the transition, provide the number and percentage of eligible BellSouth Retail Business Unit transactions performed using the new ROS system.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 75 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Describe in detail how BellSouth employees input information into the RNS, the DOE/SONGS and the new ROS, and describe any additional manual activities required of such employees to transmit this information from RNS, DOE/SONGS or ROS to the Service Order Control System ("SOCS").

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 9 in North Carolina Utilities Commission Docket P-140, SUB 73.

REQUEST: Describe in detail all edit checks provided by the software utilized in RNS, DOE/SONGS and the new ROS.

- a) For each edit check by each system, state whether the BellSouth employee using the system can "release" (forward or submit) a service request being prepared on these systems to SOCS without satisfying the edit.
- b) If the answer to (a) is affirmative, please explain how this is done.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 10 in North Carolina Utilities Commission Docket P-140, SUB 73.

**REQUEST:** Does the RNS, the DOE/SONGS or the new ROS convert a typed service request input into a format that can be accepted by SOCS? If so, explain how the conversion occurs.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 11 in North Carolina Utilities Commission Docket P-140, SUB 73.

REQUEST: Must CLEC service requests satisfy the same SOCS Service Order Edit Routine ("SOER") edits as would a BellSouth service request? If not, explain in detail the differences.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 12 in North Carolina Utilities Commission Docket P-140, SUB 73.

**REQUEST:** Are BellSouth employees utilizing the RNS, DOE/SONGS or the new ROS required to re-type Customer Service Record ("CSR") information for existing customers whose records are found in the Customer Records Information System ("CRIS") or Business Office Customer Records Information System ("BOCRIS") when preparing service requests for changes to existing BellSouth accounts? If so, identify the information that must be retyped.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 13 in North Carolina Utilities Commission Docket P-140, SUB 73.

**REQUEST:** Identify, with specificity, the particular unbundled network elements ("UNEs"), and the particular combinations of UNEs, for which maintenance and repair services can be ordered using the following interfaces:

- a) Trouble Analysis and Facilitation Interface (TAFI); and
- b) Electronic Communications Trouble Analysis (ECTA).

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 16 in North Carolina Utilities Commission Docket P-140, SUB 73.

REQUEST: For each of the OSS listed below, state whether or not a BellSouth employee using TAFI to resolve customer reported troubles is able to communicate with that system to handle the customer's complaint successfully.

- a) LMOS ("Loop Maintenance Operations System")
- b) MLT ("Mechanized Loop Testing")
- c) BOCRIS ("Business Office Customer Records System")
- d) BOSIP ("BellSouth Open System Interconnect Platform")
- e) COSMOS ("Computer System for Mainframe Operations")
- f) JMOS ("Job Management Operations System")
- g) LFACS ("Loop Facility Assignment and Control System")
- h) SOCS ("Service Order Control System")
- i) NIW ("Network Information Warehouse")
- j) OSPCM ("Outside Plant Capacity Management System")
- k) HAL ("Hands-Off" Assignment Logic System")
- l) SNECS ("Secured Network Element Contract Server")
- m) Predictor ("System used to query central office switch translations")
- n) MARCH ("System that implements central office translation changes")
- o) WFA ("Work Force Administration System")
- p) Inside Dispatch ("Central Office Technician")
- q) Outside Dispatch ("Field Technician")
- r) MA ("Maintenance Administrator") Screening Pool

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RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 17 in North Carolina Utilities Commission Docket P-140, SUB 73.

REQUEST: Identify all downstream systems, databases and communications links that a BellSouth employee/user must access manually to use TAFI to correct the trouble reported.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 83 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Identify any CLEC that has developed the electronic capability to transmit data in TAFI relating to trouble reporting/resolution transactions to their internal databases.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 18 in North Carolina Utilities Commission Docket P-140, SUB 73.

**REQUEST:** Is the Electronic Communications Trouble Analysis ("ECTA") interface, as implemented by BellSouth based upon the ANSI standards T1.227, T1.228, and T1.262, limited to entering a trouble report, modifying an existing trouble report, canceling an existing trouble report, obtaining status about existing trouble reports, and initiating a mechanized loop test and receiving the test results? If any part of your response is negative, identify the other activities for which ECTA is used.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 19 in North Carolina Utilities Commission Docket P-140, SUB 73.

**REQUEST:** Does the ECTA route all trouble reports submitted by a CLEC to a BellSouth maintenance administrator for manual screening and handling? If any part of your response is negative, describe the other routings for CLEC trouble reports.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 20 in North Carolina Utilities Commission Docket P-140, SUB 73.

REQUEST: List the telephone number-based or telephone number-associated services for which TAFI is designed to provide:

- a) Complete trouble reporting and resolution;
- b) Trouble reporting only; and
- c) Neither trouble reporting or resolution.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 21 in North Carolina Utilities Commission Docket P-140, SUB 73.

**REQUEST:** Identify, provide and describe all portions of ANSI standards T1.227, T1.228, and T1.262 that BellSouth claims prevent BellSouth from providing TAFI functionality via the Electronic Communications Trouble Analysis Interface (ECTA).

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 22 in North Carolina Utilities Commission Docket P-140, SUB 73.

REQUEST: From January 2001 until the latest reported month, across all nine BellSouth states and specifically for Kentucky, provide the total number of CLEC trouble reports received by BellSouth by interface/process.

CLEC Trouble Volumes – Nine States

Month	TAFI	ECTA	WFA	LMOS	Total
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CLEC Trouble Volumes – Kentucky

Month	TAFI	ECTA	WFA	LMOS	Total
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RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Supplemental Response to Item 89 in North Carolina Utilities Commission Docket P-55 1022 for Nine State Volumes.

**CLEC Trouble Volumes - Kentucky:**

Month	TAFI*	ECTA	WFA	LMOS	Total
Jan			81	1,177	1,258
Feb			87	1,714	1,801
Mar			207	1,358	1,565
Apr			67	1,278	1,345
May			68	1,572	1,640

\* TAFI and ECTA transactions not tracked by State

\*\* WFA and LMOS volumes equal initial trouble reports

**REQUEST:** For each month beginning January 2001 through the latest reported month, across all nine BellSouth states and specifically for Kentucky, provide the total number of BellSouth retail trouble reports received by BellSouth by interface/process.

**BellSouth Trouble Volumes – Nine States**

Month	TAFI	WFA	LMOS	Total
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**BellSouth Trouble Volumes – Kentucky**

Month	TAFI	WFA	LMOS	Total
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**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Supplemental Response to Item 90 in North Carolina Utilities Commission Docket P-55, Sub 1022 for Nine State Volumes.

**BellSouth Trouble Volumes (2001) - Kentucky:**

Month	TAFI*	WFA	LMOS	Total
Jan		1,287	26,840	28,127
Feb		1,365	35,107	36,472
Mar		1,154	28,639	29,793
Apr		1,190	28,452	29,642
May		1,597	34,197	35,794

\* TAFI Transactions not tracked by State

\*\* WFA and LMOS volumes equal initial trouble reports

**REQUEST:** For each of the last six months, provide the clearing times, number of tickets cleared per hour by employee, and trouble report queuing times while waiting for a technician to become available/assigned, for TAFI, the Loop Maintenance Operations Support (LMOS) system and the Work Force Administration (WFA) system.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 91 and First Request for Production of Documents, Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For each of the last six months, provide the average clearing time for retail troubles reported to BellSouth and handled/resolved using the LMOS/WFA system.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 91 and First Request for Production of Documents, Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For each of the last six months, provide the average "pickup" time from the time a repair service attendant or other BellSouth employee directs a customer's trouble report to the LMOS/WFA system for distribution to a Maintenance Administrator until the time the report is actually viewed by the MA.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 91 and First Request for Production of Documents, Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For each of the last six months, provide the average clearing time for retail troubles reported to BellSouth and handled/resolved using the TAFI system closed in TAFI using the front end close out process ("FECO") and closed in LMOS.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 91 and First Request for Production of Documents, Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: For each of the last six months, provide the average clearing time for retail troubles reported to BellSouth and handled and resolved using the LMOS/WFA system.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 91 and First Request for Production of Documents, Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For each of the last six months, provide the average "pickup" time from the time a repair service attendant or other BellSouth employee directs a customer's trouble report to the LMOS/WFA system for distribution to a Maintenance Administrator until the time the report is actually viewed by the MA.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 91 and First Request for Production of Documents, Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: For each of the last 12 months, provide the number of BellSouth employees in the following "work centers" dedicated to the handling of CLEC transactions across all nine BellSouth states and for Kentucky specifically.

<b>BellSouth Employees Dedicated to Handling CLEC Transactions Month / Year</b>			
<b>Local Carrier Service Center (LCSC)</b>	Atlanta	Birmingham	Jacksonville
• Resale Group			
• Complex Group			
• UNE Group			
• Project Group			
• Total LCSC			
<b>Unbundled Network Element Center (UNEC)</b>			
• Provisioning			
• Maintenance			
• Total UNCE			
<b>BellSouth Resale Maintenance Center</b>			
<b>Local Interconnection Trunking Center</b>			

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RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 97 Attachment in North Carolina Utilities Commission Docket P-55, Sub 1022.

- REQUEST: For each of the last 12 months, provide, by work center, the number of BellSouth employees in each of the BellSouth "work centers" analogous to the CLEC centers, dedicated to handling BellSouth transactions across all nine BellSouth states and for Kentucky specifically.
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 98 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For each state in the BellSouth region, please provide the number of customized routing arrangements using AIN Hubbing, if any, that BellSouth provides to CLECs, and the number of such arrangements that provided routing to a non-BellSouth OS/DA platform.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 99 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For each state in the BellSouth region, please provide the number of customized routing arrangements using Line Class Code technology, if any, that BellSouth provides to CLECs, and the number of such arrangements that provided routing to a non-BellSouth OS/DA platform.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 100 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** List all BellSouth-initiated software changes to electronic interfaces used by CLECs, which were implemented from May 1998 to the present, and indicate which changes were formally submitted by BellSouth to the Electronic Interface Change Control Process ("EICCP") or Interim Change Control Process ("I-CCP"). Provide the Change Control Request Number and date of submission for each such change formally submitted to EICCP or I-CCP.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 35 in North Carolina Utilities Commission Docket P-140, Sub 73.

REQUEST: With respect to any testing (whether external or internal testing) conducted by BellSouth of changes to the interfaces that it provides or has provided to CLECs from May 1998, to the present, describe for each such interface and each such test:

- a) the date(s) on which the test was conducted;
- b) the type of test performed;
- c) the specific objectives of the test;
- d) the results that BellSouth intended to achieve;
- e) the methodology used to perform the test;
- f) the types of service orders that were used in the test;
- g) the types of services and products that were the subject of the test;
- h) the results of the test (including a description of what the test results measured and how the measurements were defined); and
- i) any changes that were made in the interface following the test, as a result of the test.

RESPONSE: See BellSouth's previous response in North Carolina, Docket P-140, Sub 73 AT&T's 1<sup>st</sup> set, Interrogatory 36, which is quite voluminous. BellSouth will produce the requested documents at a mutually agreeable time and place. The remainder of the information responsive to this request is located in a stand alone computer located in Birmingham, Alabama. BellSouth will provide access to that computer for AT&T personnel who can then obtain the requested data for themselves. No paper copy of the information exists.

REQUEST: For the most recent six month period, please provide BellSouth's monthly wholesale revenues (or billings) for each of the following areas: residential resale, business resale, unbundled network elements, and interconnection.

RESPONSE: Residential Resale	\$ 4,093
Business Resale	\$ 5,775
Unbundled Network Elements	\$10,853
Local Interconnection	\$ 428

(\$ in Thousands)

**REQUEST:** Has BellSouth conducted any cost/benefit analysis related to increasing the level of mechanized ordering capability for any resale service, UNE, requisition, activity, or circumstance service, that currently can only be ordered by CLECs on a manual or partially mechanized basis. If so, please provided such cost/benefit analyses.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 104 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Describe the engineering standard to which BellSouth engineers its interconnection trunk(s) and trunk groups, separately identifying the process steps for engineering tandem and end office switch interconnection trunks.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 105 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Describe the analysis, including methods and procedures, BellSouth uses for determining when it will augment interconnection trunk(s) or trunk groups to prevent call blocking in its tandem switches.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 106 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Describe the analysis, including methods and procedures, BellSouth uses for determining when it will augment interconnection trunk(s) or trunk groups to prevent call blocking in its end office switches.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 107 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Describe any differences in the analysis, methods, and procedures described in Interrogatory 106, 107 and 108 from the analysis, methods, and procedures BellSouth uses to augment access tandem trunk(s) or trunk groups.

**RESPONSE:** BellSouth assumes AT&T is actually referring to Interrogatories 103, 104 and 105 in the above request.

Please refer to the response to AT&T's First Set of Interrogatories, Item 108 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: What is the ratio of tandem to end office trunks (tandem completing field) that BellSouth expects to add when CLEC interconnection trunks are added from the CLEC switch to a BellSouth Tandem.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 109 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Describe in detail BellSouth's process for determining why and when it disconnects interconnection trunks.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 110 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: From the time period November 1, 2000 to the present, please describe:

- 1) how many separate times BellSouth disconnected interconnection trunks in Kentucky. This includes reducing the size of existing trunk groups by disconnecting members of the trunk group;
- 2) in what specific locations did BellSouth disconnect interconnection trunks in Kentucky;
- 3) in the above instances, how many days prior to the disconnect did BellSouth notify AT&T that the disconnect would occur; and
- 4) in how many of these instances did BellSouth await a response from AT&T that the disconnect was appropriate?

RESPONSE: 1) BellSouth disconnected no trunks on BellSouth managed interconnection groups to AT&T in Kentucky.

There were only two groups with disconnects, both AT&T managed, as identified below:

State	TGSN	TrkType	LocA	LocZ	CCNA	Trunks in Service After Disc	Date	Trunk Change
KY	AF152954	DF-4TDJ800KE	LSVLKYCS0MD	LSVLKYAP2GT	ATX	192	20010410	-24
KY	AF153224	DF-4TDJ8001KE	LSVLKYCS0MD	LSVLKYAP2GT	LOA	48	20010515	-24

2) Does not apply

3) Does not apply

4) Does not apply

- REQUEST: Describe the methods, procedures, and processes BellSouth uses with CLECs for preventing a customer from being without local telephone service during and just after BellSouth "ports" that customer's telephone number.
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 112 and First Request for Production of Documents Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Describe the root cause of loss of inbound service, and/or partial loss of inbound service, on calls from BST customers to AT&T customers. Specifically, this problem involves the loss of the ability for some BST customers to place calls to some AT&T business and residence customers after the AT&T customer has been ported from BST. Please describe all root causes for both residential and business customers.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 113 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Describe the solutions that BST is pursuing to eliminate the problems described in Interrogatory 113 above.

RESPONSE: BellSouth assumes AT&T is actually referring to Interrogatory 111 in the above request.

Please refer to the response to AT&T's First Set of Interrogatories, Item 113, 114 and 117 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: How many CLEC customers lost the ability to receive calls from some or all BellSouth customers during all months in 2001.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 115 and First Request for Production of Documents Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Describe the analysis, methods, procedures, and processes BellSouth uses to reassign telephone numbers.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 116 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Describe the analysis, methods, procedures, and processes BellSouth uses with customers who have DID service behind a PBX so that when that customer ports numbers from BellSouth to a CLEC.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 117 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Describe the analysis, methods, procedures, and processes BellSouth uses when it is porting part of a customer's telephone numbers to a CLEC.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 118 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Describe the analysis, methods, procedures, and processes BellSouth uses to prevent duplicate billing of customers who have moved or transferred their local telephone service to a CLEC and describe the process BellSouth follows to correct this type of duplicate billing.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 119 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Describe the problems BellSouth has experienced in providing accurate calling party information when it ports a number.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 120 in North Carolina Utilities Commission Docket P-55, Sub 1022.

- REQUEST: Identify the nature of the "fix" BellSouth proposes to address this calling party information problem and identify the dates by which this "fix" will be tested and ready for use in each of the states in BellSouth's region.
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 121 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Describe in detail, with examples, how BellSouth is calculating the information used to populate the Trunk Group Performance - Aggregate report that is produced each month. This should include a description of the types of trunks used in the calculation, the method of calculating the blocking on each trunk, and the mathematical calculations used to aggregate trunk blocking amongst trunks for a particular hour.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Supplemental Response to Item 122 and Item 122 Attachment in North Carolina Utilities Commission Docket P-55, Sub 1022

**REQUEST:** Describe in detail how the SEEM Analog/Benchmarks for the Trunk Group Performance measure is calculated. Include in this description the types of trunk groups evaluated, the way in which each trunk group is evaluated, and the mathematical method of aggregating trunk group results.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Supplemental Response to Item 123 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Describe BellSouth's rationale for proposing that the SEEM measure for trunk group performance should be based on a .5% difference in blockage in any two hour period in 24 hours.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Response to Item 124 in North Carolina Utilities Commission Docket P-55, Sub 1022.

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**THERE IS NO INTERROGATORY 123**

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**THERE IS NO INTERROGATORY 124**

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**THERE IS NO INTERROGATORY 125**

- REQUEST: Identify the number of service center employees who handle help requests related to Local Number Portability problems and state the hours during which such employees are present at the facility.
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 126 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: What process or mechanism does BellSouth's system use to identify UNE-Loop related orders?

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 127 in North Carolina Utilities Commission Docket P-55, Sub 1022.

- REQUEST: What process does BellSouth use to ensure that the loop facility, porting, facility disconnect, personnel dispatch and other internal components of an order are updated with subsequent and supplemental information pertaining to related orders?
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 128 and 127 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please state all methods and procedures related to calls answered by BellSouth's Local Carrier Services Center ("LCSC") as well as methods and procedures related to calls answered by BellSouth's Retail Service Centers ("RSCs") and calls answered by BellSouth's Business Service Centers ("BSCs").

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 129 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please state BellSouth's methods and procedures as well as provide any and all information used to determine the start time used in BellSouth's Hot Cut Timeliness performance and to capture and verify that start time date.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 130 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: How does BellSouth treat its own orders for maintenance relating to erroneously disconnected end users of BellSouth? (i.e. does BellSouth repair erroneously disconnected BellSouth end-users through a BellSouth maintenance request or is BellSouth retail required to send in a new order to fix or repair BellSouth's erroneously disconnected BellSouth end-user?)

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 131 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** How does BellSouth treat a CLEC's order for maintenance relating to erroneously disconnected end users of the CLEC? (i.e. does BellSouth repair erroneously disconnected CLEC end-users through a maintenance request that takes 24 hours or does BellSouth require a CLEC to send in an entirely new order to fix or repair the CLEC's erroneously disconnected CLEC end-user?)

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 132 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please state and provide the data results for all orders classified as partially mechanized orders during the second retest of O&P Test 1-2-3 and O&P Test 1-3-3.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 133 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: What is the minimum required amount of amperage a CLEC collocator must order for a physical collocation cage?

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 134 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Is the minimum amount of amperage different depending on whether the CLEC is powering individual equipment bays versus powering the CLEC's BDFB?

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 135 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** When a CLEC power request causes BellSouth to augment its physical power plant, what percentage or total cost does BellSouth allocate to CLECs on a non-recurring and recurring basis?

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 136 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Are the non-recurring charges associated with the augment charged to the CLEC that caused the augment or are they allocated to all prospective collocators. What is the basis for any allocation used?

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 137 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please identify charges assessed made by BellSouth to AT&T for cable under USOC PE1PM (cable) at the following Kentucky collocation site: LSVLKYAP. Please identify what this recurring charge is for. If it is for power cable, please identify for each location, if the cable is feeding power from a BellSouth BDFB or directly from the power equipment.

**RESPONSE:** PE1PM is a cable support structure USOC and is a recurring charge per entrance facility. It covers the cost of cable racks and supports in cable vaults. In Kentucky, AT&T presently pays BellSouth \$24.23 per cable for cable support structures.

**REQUEST:** When BellSouth requires a collocator to physically provision a collocation cage, how much additional recurring or non-recurring cost does BellSouth charge the CLEC for cross-connects when the CLEC collocator has provisioned his own physical cross-connects? Why does BellSouth charge for these cross-connects that are initially provisioned and provided for by the CLEC collocator?

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 139 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Does BellSouth have electronic OSS for line splitting?

If not, describe the steps for manual order for line splitting, including time frames for acknowledgement, FOC and provisioning from FOC for line splitting; and when does BellSouth expect to have electronic OSS for line splitting?

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 140 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: If a CLEC is providing voice service to a customer using UNE-P and the CLEC wants to engage in line splitting, will BellSouth allow the CLEC to use the same loop and port that was providing voice service only to provide line splitting? If your answer is no, please explain the reasons why a CLEC can not use the same loop and port that was providing the voice service only to provide line splitting.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Response to Item 141 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: What is the percentage of NGDLC in BellSouth's network?

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 142 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: What is the percentage of NGDLC in BellSouth's network in Kentucky?

RESPONSE: The total NGDLC wkg lines = 77,602

Total wkg lines in state = 1,355,520

% NGDLC of Total wkg lines = 5.7%

**REQUEST:** Will BellSouth continue to provide xDSL service to a customer who was receiving voice and data services from BellSouth and now wants to receive voice service from a CLEC but retain BellSouth as their data provider?

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Response to Item 144 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Will BellSouth provide the splitter for a CLEC to serve a new customer through line splitting? If not, why not?

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Response to Item 145 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Does BellSouth provide the splitter for CLECs to engage in line sharing with BellSouth?

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Response to Item 146 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** When and under what circumstances did BellSouth first determine that a CLEC UNE-P customer lost dial tone upon conversion from BellSouth service to CLEC UNE-P service due to BellSouth's working a "D" (disconnect or termination) order but not working the related "N" (conversion) order?

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 147 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** On what date did BellSouth undertake to form a task team to address the loss of dial tone incidents described in Interrogatory No. 147 by developing or generating a new single C- order" (change order) process for UNE-P conversions? Identify the members of the team and the team leader.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 148 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Describe the action plan or steps and the timeline for the development or generation of a new "single C order" process as described in Interrogatory 148. Identify any documents comprising, relating or referring to the action plan or steps described in the preceding sentence.

**RESPONSE:** Please refer to the response to AT&T's First Request for Production of Documents, Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Is it BellSouth's practice to send out a completion notice on a conversion from BellSouth service to CLEC UNE-P service before all orders involved in the conversion are completed by BellSouth? If not, describe BellSouth's policy and practice in this regard.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 150 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Explain why BellSouth does not treat loss of dial tone incidents as described in Interrogatory 147 as a maintenance issue to be handled by a BellSouth maintenance center personnel.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 151 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Does BellSouth intend to recognize loss of dial tone as a maintenance issue? If so, when?

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 152 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: When converting a customer from BellSouth to a CLEC using UNE-P, is BellSouth using the same facilities or does BellSouth move the customer's service from one facility to another? If moved, why does BellSouth change the facility used?

RESPONSE: BellSouth uses the same facility.

- REQUEST: When a CLEC reports a loss of dial tone incident on a UNE-P order to BellSouth, BellSouth dispatches a service technician to resolve the problem. for what reason is the service technician dispatched and what tasks does the technician perform?
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 154 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Are UNE-P customers who were on IDLC facilities prior to their conversion to a CLEC UNE-P left on the existing facilities or are they changed to universal or copper facilities before or at the time of the conversion?

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Response to Item 155 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please explain what the phrase “non-leveragable legacy system means (as that phrase is used in the Rebuttal Testimony of Ken Ainsworth filed in Alabama Docket No. 25835 on June 19, 2001), and identify all of BellSouth’s OSS that are “non-leveragable systems”.

**RESPONSE:** Please refer to the response to AT&T’s First Request for Production of Documents, Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

- REQUEST: Please explain what the phrase "sunset list" means (as that phrase is used in the Rebuttal Testimony of Ken Ainsworth filed in Alabama Docket No. 25835 on June 19, 2001), and identify all of BellSouth's OSS that are on the "sunset list".
- RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

- REQUEST: For each system that is on BellSouth's "sunset list," describe BellSouth's plans to replace such systems, including but not limited to the anticipated technology to be used, functionality, and implementation schedule.
- RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, Item 57 in North Carolina Utilities Commission Docket P-55, Sub 1022.

REQUEST: Please describe BellSouth's "strategic direction and goals" as that phrase is used in Mr. Ainsworth Rebuttal Testimony filed on June 19, Docket No. 25835, and how "ROS" fails to meet such direction and goals.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 159 in North Carolina Utilities Commission Docket P-55, Sub 1022.

- REQUEST: Please provide any data available on call defects per million that would include all lost calls, for reasons of blocking, outages, etc. Provide this information segmented by call defects per million for CLEC calls and defects per million for calls within the BellSouth network. Provide this data in the most disaggregate form available, by month.
- RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 1 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please provide trunk by trunk blocking data for all CLEC trunks that had call blocking over 2% during the months of January, February, March, April and May 2001. For the protection of proprietary information, the names of individual CLECs should be redacted.

**RESPONSE:** BST did a complete evaluation of all CLEC trunk groups in Kentucky for the months of January, February, March, April, and May 2001 and found that no CLEC trunk groups had blockage that exceeded 2% blocking.

**REQUEST:** Please identify all of the access tandems in Kentucky and in each state in the BellSouth region by CLLI codes and English identifiers. Give the tandem completing fields for each switch, listing all trunk groups to each end office, the size of the trunk group and the types of traffic on each.

**RESPONSE:** Please refer to the response to AT&T's Second Set of Interrogatories, Item 4 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please identify all of the local tandems in Kentucky and in each state in BellSouth region by CLLI codes and English identifiers. Give the tandem completing fields for each switch, listing all trunk groups to each end office, the size of the trunk group and the types of traffic on each.

**RESPONSE:** Please refer to the response to AT&T's Second Set of Interrogatories, Item 5 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** Please identify all tandems in Kentucky and in each state in the BellSouth region that are both access and local tandems by CLLI codes and English identifiers. Specify whether these tandems are segmented into different logical switches which have different tandem completing fields. Give the tandem completing fields for each switch, listing all end offices connected to each, all trunk groups to each end office, the size of the trunk group and the types of traffic on each.

**RESPONSE:** Please refer to the response to AT&T's Second Set of Interrogatories, Item 6 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For Kentucky and each of the BellSouth states, please provide the average cabling distance that exists between BellSouth's BDFBs and the collocation areas that they serve.

**RESPONSE:** Please refer to the response to AT&T's Third Set of Interrogatories, Response to Item 1 in North Carolina Utilities Commission Docket P-55, Sub 1022.

**REQUEST:** For Kentucky and each of the BellSouth states, please indicate whether any interconnection arrangements in Kentucky between BellSouth interconnection frames and collocation arrangements require repeaters. If so, please indicate the central office and the transmission rate for which the repeaters are required (DS1 or DS3).

**RESPONSE:** In Kentucky, repeaters have not been required for the interconnection of any DS1 or DS3 circuits from collocation arrangements to BellSouth interconnection frames.

REQUEST: Please provide any standard collocation interconnection agreement terms and conditions that BellSouth uses for its interconnection agreements with competing local exchange carriers in Kentucky.

RESPONSE: See documents provided in response to AT&T's 3<sup>rd</sup> Request for Production, Item No. 4, in North Carolina Utilities Commission Docket P-55, Sub 1022.

See Attachments to POD 80 for the Microwave Interconnection agreement that contains the terms and conditions for all states.

**REQUEST:** Identify all BellSouth employees or agents involved in investigating and resolving or who have knowledge of the local service and network problems reported to BellSouth by AT&T Broadband in Trouble Ticket Nos. KI015929 and KI016185 during the period March 16 to April 4, 2001 ("dead air problems") and describe identified individuals involvement with these issues.

**RESPONSE:**

Christopher Barnes, Network Manager, 526 Armory Place, Louisville, KY, 502-582-3400.

Mr. Barnes is the supervisor over the Armory Place work group that performed the switch-related maintenance and testing.

Paul Kim Fisher, Specialist, Room 3NE, 601 W. Chestnut St., Louisville, KY, 502-582-0499

Mr. Fisher is the Network Infrastructure Support Center (NISC) technical specialist who handled troubleshooting related to translations.

Terry Scott Peach, Network Manager, 601 W. Chestnut St., Louisville, KY, 502-582-0496

Mr. Peach is the Network Infrastructure Support Center (NISC) supervisor over the group handling translations input, testing assistance and verification.

Vicki Lay, Center Support Manager, Bldg 2300, 2445 Commerce Av, Duluth, GA, 404-541-4028

Ms. Lay is the Customer Wholesale Interconnection Network Services Center (CWINS) supervisor over the CLEC Single Point of Contact (SPOC) for provisioning and maintenance of all resale and unbundled network element (UNE) services. The CWINS group was the control office on both trouble tickets.

**REQUEST:** Describe the manner in which Louisville Armory Place switching facilities currently carry BellSouth and CLEC telecommunications traffic, including, but not limited to, the manner in which such traffic is split or allocated at the Louisville Armory Place switching facilities to provide service to customers.

**RESPONSE:**

There are two tandems located in the Armory Place Building, one for local traffic (LSVLKYAP30T) and one for access/toll traffic (LSVLKYAP2GT). BellSouth has built reciprocal trunk groups for most of the CLECs operating in the Louisville area off each of these tandems.

The reciprocal trunk group to any CLEC off the LSVLKYAP30T local tandem carries traffic to CLECs from offices in the Louisville EAS (Extended Area Service) calling area including traffic from southern Indiana (Ameritech territory). The reciprocal trunk group off of the LSVLKYAP2GT access tandem carries traffic to CLECs from calls originated from offices outside of the Louisville EAS area that home on the LSVLKYAP2GT tandem (intra-LATA toll). However, there are some instances where all traffic (EAS and intra-LATA toll) destined for a specific CLEC is routed via the LSVLKYAP2GT tandem because the CLEC preferred this type of arrangement in lieu of having reciprocal trunk groups off of both tandems. BellSouth is responsible for placing orders with each CLEC to establish reciprocal trunks groups off of the Armory Place tandems.

There is also a transient trunk group off the LSVLKYAP2GT access tandem that is ordered by each CLEC. This trunk group carries traffic destined to/from the CLEC from other CLECs, IXCs, and independent companies. However, there is a routing problem in the Louisville area today with traffic from Ameritech customers in southern Indiana (which has EAS with Louisville) destined for CLECs. We recently discovered that Ameritech was incorrectly routing this type of traffic to the LSVLKYAP30T local tandem to be completed to the CLEC off the BellSouth reciprocal trunk group to the CLEC instead of routing the traffic to the LSVLKYAP2GT access tandem to be completed to the CLEC via their transient trunk group off the LSVLKYAP2GT access tandem. This misrouting of traffic is not service affecting and BST is in the process of negotiating trunk augments with Ameritech and with appropriate CLECs in order to size the network to properly handle the CLEC traffic load from southern Indiana via the access tandem and the transient trunk group. This situation was discovered after Ameritech personnel rerouted all of their CLEC traffic from their trunk group to LSVLKYAP30T to their trunk group to LSVLKYAP2GT after receiving a complaint from a CLEC about the current misrouting situation. This immediate and spontaneous response to the customer's complaint caused severe blockage on the trunk group from Ameritech to

LSVLKYAP2GT and BellSouth immediately contacted Ameritech to reroute the traffic back the way it was previously via LSVLKYAP30T until Ameritech, BellSouth, and affected CLECs have augmented their networks appropriately in order to handle this large shift of traffic. This particular incident is in no way related to the "dead air" issue.

REQUEST: Identify and describe all facilities and network changes to the Louisville Armory Place switching facilities with respect to BellSouth and CLEC telecommunications traffic during the period January 1, 1999 to the present.

RESPONSE: There have been no central office conversion activities in the Armory Place building complex since prior to January 1, 1999. Neither has there been any IOF (Interoffice Facility) facility or equipment rearrangements (e.g., rolling circuits from an asynchronous ring to a SONET (Synchronous Optical Network) ring, moving circuits from one DCS (Digital Cross-connect System) machine to another) that would impact BellSouth and CLEC traffic at the Armory Place complex since January 1, 1999.

There have been three significant switching events, outside of normal trunk growth, since January of 1999:

<u>Event Description</u>	<u>Project</u>	<u>Start</u>	<u>Svc Date</u>
JNET to ENET Conversion	P5D0852	1/11/1999	5/29/1999
DS1 Infc Card Upg (6X50AA-6X50AB)	2029425	6/12/2000	6/30/2000
Addition of Spectrum Peripheral Modules	2009039	5/08/2000	7/15/2000

In each of these instances, Nortel was contracted as the installation vendor. Nortel and BellSouth personnel employed standard test and verification procedures for this equipment to validate proper operation upon completion of the installation work.

**REQUEST:** For any facilities and network changes to the Louisville Armory Place switching facilities identified in Interrogatory No.171, describe the actions taken by BellSouth, if any, to ensure any changes made to the LAP switching facilities did not adversely effect CLEC telecommunications traffic.

**RESPONSE:** As noted in Item Number 170, the equipment vendor and BellSouth personnel employed standard test and verification procedures for this equipment to validate proper operation upon completion of the installation work.

REQUEST: Identify and describe BellSouth's process for ensuring that facility and network changes on its network will not adversely effect CLEC telecommunications traffic, including, but not limited to, any testing, inspection or CLEC notification procedures.

RESPONSE: Each network affecting work function, whether routine daily tasks or significant conversion/upgrade activity, requires test and verification procedures in accordance with the individual nature of that function or the equipment and network elements involved. Installation and testing requirements specified by the equipment vendor are rigorously followed. In addition, testing standards developed over the years by Bell Laboratories, Telcordia and various standards organizations such as the American National Standards Institute (ANSI), the Alliance for Telecommunications Industry Solutions (ATIS) and the International Telecommunication Union (ITU-CCITT) provide the foundation for almost all test and verification procedures used by BellSouth.

The magnitude of different testing requirements for the vast array of network components used precludes providing a definitive catalog of test standards, but following is one listing of various sections of the Telcordia Lata Switching System Generic Requirements (LSSGR) as an example of the type and scope of documentation involved:

- GR-30-CORE *LSSGR Voiceband Data Transmission Interface, Section 6.6*
- GR-31-CORE *LSSGR: CLASS Feature: Calling Number Delivery (FSD 01-02-1051)*
- GR-32-CORE *LSSGR: CLASS Feature: Bulk Calling Line Identification (FSD 02-02-1280)*
- GR-215-CORE *LSSGR: CLASS Feature: Automatic Callback (FSD 01-02-1250)*
- GR-216-CORE *LSSGR: CLASS Feature: Customer Originated Trace (FSD 01-02-1052)*
- GR-217-CORE *LSSGR: CLASS Feature: Selective Call Forwarding (FSD 01-02-1410)*
- GR-218-CORE *LSSGR: CLASS Feature: Selective Call Rejection (FSD 01-02-0760)*
- GR-219-CORE *LSSGR: CLASS Feature: Distinctive Ringing/Call Waiting (FSD 01-01-1110)*
- GR-220-CORE *LSSGR: CLASS Feature: Screening List Editing (FSD 30-28-0000)*
- GR-227-CORE *LSSGR: CLASS Feature: Automatic Recall (FSD 01-02-1260)*
- GR-268-CORE *ISDN Basic Rate Interface Call Control Switching and Signaling Generic Requirements*
- GR-283-CORE *Simplified Message Desk Interface (SMDI)*
- GR-317-CORE *LSSGR: Switching System Generic Requirements for Call Control Using the Integrated Services Digital Network User Part (ISDNUP)*

- GR-391-CORE LSSGR: *CLASS Feature: Calling Identity Delivery Blocking Features* (FSD 01-02-1053)
- GR-394-CORE LSSGR: *Switching System Generic Requirements for Interexchange Carrier Interconnection (ICI) Using the Integrated Services Digital Network User Part (ISDNUP)*
- GR-416-CORE *CLASS Feature: Call Waiting Deluxe* (FSD 01-02-1215)
- GR-478-CORE *Measurements and Data Generation*
- GR-505-CORE *Call Processing*
- GR-506-CORE LSSGR: *Signaling for Analog Interfaces*
- GR-507-CORE LSSGR: *Transmission, Section 7*
- GR-508-CORE LSSGR: *Automatic Message Accounting (AMA), Section 8*
- GR-510-CORE LSSGR: *System Interfaces, Section 10*
- GR-511-CORE LSSGR: *Service Standards, Section 11*
- GR-512-CORE LSSGR: *Reliability, Section 12*
- TR-TSY-000517 LSSGR: *Traffic Capacity and Environment, Section 17*
- GR-520-CORE LSSGR: *Features Common to Residence and Business Customers I* (FSDs 00 to 01-01-1000)
- GR-524-CORE LSSGR: *Attendant and Customer Switching System Features and Customer Interfaces*
- GR-528-CORE *Public Telecommunications Services* (FSD 10-01-0000)
- GR-529-CORE LSSGR: *Public Safety*
- GR-531-CORE LSSGR: *Interoffice* (FSDs 25-05-0903, 25-06-0501, 25-06-0502, 25-06-0506)
- GR-532-CORE LSSGR: *Call Processing Features* (FSDs 30-16-0000 through 30-23-0000)
- GR-533-CORE LSSGR: *Database Services - Service Switching Points* (FSD31-01-0000)
- GR-536-CORE LSSGR *Trunk, Line, and Special Service Circuit Test* (FSD 40-02-0301 and FSD 40-04-0100)
- GR-540-CORE LSSGR: *Tandem Supplement*
- GR-560-CORE LSSGR: *Individual Line* (FSD 01-02-0100)
- GR-561-CORE LSSGR: *Two- Party Line* (FSD 01-02-0200)
- GR-562-CORE LSSGR: *Manual Line Features* (FSD 01-02-0301)
- GR-563-CORE LSSGR: *Denied Termination* (FSD 01-02-0500)
- GR-564-CORE LSSGR: *Code Restriction and Diversion* (FSD 01-02-0600)
- GR-565-CORE LSSGR: *Voice/Data Protection* (FSD 01-02-0710)
- GR-567-CORE LSSGR: *CLASS Feature: Anonymous Call Rejection* (FSD 01-02-1060)
- GR-568-CORE LSSGR: *Series Completion* (FSD 01-02-0801)
- GR-569-CORE LSSGR: *Multiline Hunt Service* (FSD 01-02-0802)
- GR-570-CORE LSSGR: *Speed Calling* (FSD 01-02-1101)

- GR-571-CORE LSSGR: *Call Waiting* (FSD 01-02-1201)
- GR-572-CORE LSSGR: *Cancel Call Waiting* (FSD 01-02-1204)
- GR-573-CORE LSSGR: *Business Group Call Waiting* (FSD 01-02-1205)
- GR-574-CORE LSSGR: *Business Group Automatic Callback* (FSD 01-02-1240)
- GR-575-CORE LSSGR: *CLASS Feature: Calling Identity Delivery on Call Waiting* (FSD 01-02-1090)
- GR-577-CORE LSSGR: *Three-Way Calling* (FSD 01-02-1301)
- GR-578-CORE LSSGR: *Sensitive Three-Way Calling* (FSD 01-02-1304)
- GR-579-CORE LSSGR: *Add-On Transfer and Conference Calling Features* (FSD 01-02-1305)
- GR-580-CORE LSSGR: *Call Forwarding Variable* (FSD 01-02-1401)
- GR-581-CORE LSSGR: *Remote Call Forwarding* (FSD 01-02-1402)
- GR-586-CORE LSSGR: *Call Forwarding Subfeatures* (FSD 01-02-1450)
- GR-588-CORE LSSGR: *Customer Premises Message Registers* (FSD 01-02-1900)
- GR-590-CORE LSSGR: *Call Pickup Features* (FSD 01-02-2800)
- GR-600-CORE LSSGR: *Private Facility Access* (FSD 02-01-0000)
- GR-601-CORE LSSGR: *Outward Wide Area Telecommunications Service* (FSD 02-01-0030)
- GR-602-CORE LSSGR: *Customer Control* (FSD 02-02-0010)
- GR-603-CORE LSSGR: *Outgoing Facility Group Queuing* (FSD 02-02-0200)
- GR-604-CORE LSSGR: *Automatic Flexible Routing* (FSD 02-02-0300)
- GR-605-CORE LSSGR: *Authorization Codes for Automatic Flexible Routing (AFR) and Account Codes for Basic Business Group and AFR* (FSD 02-02-1010)
- GR-606-CORE LSSGR: *Common Channel Signaling, Section 6.5*
- GR-610-CORE LSSGR: *Message Detail Recording (MDR)* (FSD 02-02-1110)
- GR-615-CORE LSSGR: *Generic Requirements for Message Detail Recording (MDR) Access Interfaces* (FSD 02-02-1115)
- GR-621-CORE LSSGR: *Traffic Data Provision Features* (FSD 02-02-1200)
- GR-666-CORE LSSGR: *Universal Pair Gain Systems* (FSD 20-02-0200)
- GR-672-CORE LSSGR: *Bridge Services on an IDLC System* (FSD 20-02-2010)
- GR-674-CORE LSSGR: *Special Information Tones* (FSD 20-06-0500)
- GR-675-CORE LSSGR: *Expanded Announcement System* (FSD 20-06-0600)
- GR-677-CORE LSSGR: *Reverting Service* (FSD 20-10-0000)
- GR-679-CORE LSSGR: *Nail-Up of Non-Switched Circuits on a Local Switch* (FSD 20-16-0000)
- GR-690-CORE: *Exchange Access Interconnection* (FSD 20-24-0000)
- GR-691-CORE LSSGR: *Facility/Service Selective Dialing Switching and Signaling Requirements* (FSD 20-24-0020)

- GR-692-CORE LSSGR: *Exchange Access Operator Services System Signaling* (FSD 20-24-0030)
- GR-693-CORE LSSGR: *Presubscription Indication* (FSD 20-24-0040)
- GR-695-CORE LSSGR: *Integrated Multiple Access Switched Services (IMASS)* (FSD 20-24-0060)
- GR-697-CORE LSSGR: *Feature Group A* (FSD 20-24-0200)
- GR-698-CORE LSSGR: *Feature Group B* (FSD 20-24-0300)
- GR-738-CORE LSSGR: *Local Point-To-Point Data Collection* (FSD-45-06-0207)
- TR-740 *Stored Program Control System/Operations System (SPCS/OS) - Network Data Collection Operations System (NDC OS) Interface*
- GR-741-CORE LSSGR: *Network Administration Center (NAC) Input/Output (I/O) Channel* (FSD 45-10-0000)
- GR-745-CORE LSSGR: *Service Specific Call Gapping* (FSD 45-17-0000)
- GR-747-CORE *An Alternative Implementation of an SPCS to NTM OS Interface via an NDC OS* (FSD 45-18-0450)
- GR-1083-CORE *Generic Requirements for Exchange Access Automatic Message Accounting (AMA)* (FSD 20-25-0000)
- GR-1188-CORE LSSGR: *CLASS Feature: Calling Name Delivery Generic Requirements* (FSD 01-02-1070)
- GR-1251-CORE LSSGR: *CLASS Feature: Numbering Plan Area Split Management* (FSD 30-29-0000)
- TR-NWT-001268 *ISDN Primary Rate Interface Call Control Switching and Signaling Generic Requirements for Class II Equipment*
- GR-1401-CORE LSSGR: *Visual Message Waiting Indicator Generic Requirements* (FSD 01-02-2000)
- GR-1436-CORE LSSGR: *CLASS Feature: Visual Screening List Editing* (FSD 30-28-0100)
- GR-1504-CORE *Generic Requirements for Wireless Service Provider AMA*
- GR-1512-CORE *Call Screening* (FSD 01-02-2100)
- GR-1517-CORE *CLASS(SM) Feature: Outside Calling Area Alerting*
- GR-1520-CORE *Ring Control* (FSD 01-02-2200)
- GR-2857-CORE RTPFR: *Generic Requirements for the Signaling System 7 (SS7) Release to Pivot (RTP) Phase I Network Capability*
- GR-2913-CORE *Generic Requirements for Call Park* (FSD 01-02-2400)
- GR-2931-CORE *High Probability of Completion Network Capability* (FSD 15-10-0000)
- GR-2932-CORE *Database Functionalities*
- GR-2948-CORE *Prompted Automatic Callback* (FSD 01-02-1255)
- GR-2953-CORE *Enhanced MF Signaling: E9-1-1 Tandem to PSAP Interface*

- GR-2956-CORE *CCS/SS7 Generic Requirements in Support of E9-1-1 Service*
- GR-2963-CORE *OTGR, Section 2.2, Network Element Configuration Management - Software Management*
- GR-2967-CORE *ISDN Basic Rate Interface (BRI) E9-1-1 Tandem to ISDN PSAP Interface*
- GR-2968-CORE *ISDN Primary Rate Interface (PRI): E9-1-1 Tandem to ISDN PSAP Interface*
- GR-2970-CORE *Service Provider Identification Capability Specification (FSD 30-40-0000)*
- GR-3006-CORE *CLASS(SM) Feature: Voice Identity for Non-Subscribers*
- SR-4163 E9-1-1 Service Description

REQUEST: Describe the actions taken by BellSouth to investigate and resolve the dead air problems experienced by AT&T customers during the period of March 16 to April 4, 2001.

RESPONSE: This information has been provided previously. Please refer to: Reply Affidavit Of W. Keith Milner On Behalf Of Bellsouth Telecommunications, Inc., Filed July 16, 2001, Before The Georgia Public Service Commission Atlanta, Georgia, Docket No. 6863-U, pages 22 – 24 and Answer of BellSouth Telecommunications, Inc. and Motion to Dismiss Complaint of AT&T Communications of the South Central States, Inc., filed July 2, 2001, Before the Public Service Commission, Commonwealth of Kentucky.

**REQUEST:** Describe why BellSouth "closed" or ceased further action to investigate and remediate the dead air problems stated in Trouble Ticket No.KI015929.

**RESPONSE:** This trouble ticket was opened Friday, March 23, 2001, at 12:32 pm (EDT), as a routing issue in response to AT&T's trouble report to the Customer Wholesale Interconnection Network Services Center (CWINS). Specifically, the trouble was reported as a BellSouth telephone number, 502-587-xxxx, that could not call an AT&T telephone number, 502-742-xxxx.

The trouble ticket was handed off to the Complex Translations Group (CTG) in the Network Infrastructure Support Center (NISC). The NISC technician referred the ticket back due to insufficient information, requesting the Trunk Group Serial Number (TGSN) of the trunk group for which routing translations needed to be validated.

AT&T provided the TGSN AF192076, the reciprocal trunk group from the Armory Place local tandem to AT&T. Following verification of routing translations on this group, the NISC technician reported that calls were being routed correctly. He also reported that 168 of the 336 trunks were in lockout status.

The CWINS technician contacted AT&T to report the finding regarding routing translations and to ask about the busied-out trunks. AT&T indicated that the busied-out trunks would be checked and asked BellSouth to hold the trouble ticket open until Monday, March 26. According to the AT&T log, AT&T found that every other DS1 carrying the trunks on this group was "down"; they indicated that the trunks were in "INB" (installation busy) status. AT&T handed the busied-out trunks off to their Local Network Services Trunk Optimization Center (TOC) for resolution.

On Saturday, March 24, AT&T contacted the BellSouth CWINS group to request test assistance from the CTG. CWINS handed the ticket off to the CTG group, which then worked with AT&T until mid-afternoon. AT&T and BellSouth mutually agreed to continue work on Monday, March 26.

On Monday, March 26, BellSouth contacted AT&T which asked that the trouble ticket be held open until 5:00 pm (EDT), at which time, if AT&T had not called back, the ticket could be closed. Since AT&T did not call back, the ticket was closed.

**REQUEST:** Identify and describe the circumstances which BellSouth determined that the dead air problems experienced by AT&T customers during the period of March 16 to April 4, 2001 was caused by a faulty T1 card at the Louisville Armory Place switching facility.

**RESPONSE:** On Tuesday, April 3, 2001, at about 1:30 pm (EDT), AT&T reported a trouble to the CWINS group that when telephone number 502-587-xxxx (BellSouth) called 502-742-xxxx (AT&T), the call went to a "Call cannot be completed as dialed" announcement or to "dead air". The CWINS group opened trouble ticket KI016185. AT&T requested a check of translations/routing. AT&T initially identified the trunk group to check as TGSN AF192076. The trunk group was subsequently determined to be AF192075, the reciprocal group from the Armory Place access tandem to AT&T.

Translations were determined to be correct.

Throughout the afternoon, various tests ultimately identified that one T1 carrier for the trunk group tested "bad". BellSouth suggested that AT&T change out the T1 card on their end. AT&T did so, but this action did not correct the T1 problem. Logically, BellSouth concluded that the T1 card at Armory Place needed to be changed out. When the card was replaced early on Wednesday, April 4<sup>th</sup>, the T1 tested good and the dead air problem disappeared.

**REQUEST:** Identify the duration of the problems with the faulty T1 card as described in Interrogatory 175 and the dead air problem at the Louisville Armory Place switching facilities and why such problems were not discovered by BellSouth until April 2001.

**RESPONSE:** The T1 card was assumed to be defective on April 4 since the reported problem disappeared after its replacement. Therefore, the duration of the problem associated with the card was presumably from March 16, as reported by AT&T, to April 4.

The nature of the assumed failure of the card has not been determined. Plug-in cards are not field testable or repairable. The "bad" T1 did not have a hard failure such that the automated switch trunk checks would identify the problem, busy out the trunks and report an error. It was only through the kind of trouble isolation performed jointly by BellSouth and AT&T that such a problem can be resolved.

**REQUEST:** Identify the duration of the problems with the faulty T1 card as described in Interrogatory 175 and the dead air problem at the Louisville Armory Place switching facilities and why such problems were not discovered by BellSouth until April 2001.

**RESPONSE:** As indicated in Item 176, the T1 card has been assumed to be faulty since the problem disappeared when it was replaced. The card is not field testable and the nature and extent of any card failure cannot be determined.

Therefore, since the trunk group had 48 members on two T1 carrier systems, the bad T1 would affect service on half the trunks in the group. Approximately every other call would be affected and, based on trouble symptoms, calls either went to dead air or to a "Call cannot be completed as dialed" announcement.

REQUEST: Describe why T1 card identified in Interrogatory 175 was faulty.

RESPONSE: As indicated in Item 176, the plug-ins involved are not field testable or repairable. The nature of its assumed fault cannot be determined.

**REQUEST:** Describe and explain the actions taken by BellSouth regarding the repair of the faulty T1 card at the Louisville Armory Place switching facilities and the resolution of the dead air problems, including, but not limited to, the date and time the faulty T1 card was discovered, BellSouth's activities in physically repairing or replacing the faulty T1 card and the interval time between BellSouth's discovery of the faulty T1 card and its repair or replacement.

**RESPONSE** The majority of this information has been provided previously. Please refer to: Reply Affidavit Of W. Keith Milner On Behalf Of Bellsouth Telecommunications, Inc., Filed July 16, 2001, Before The Georgia Public Service Commission Atlanta, Georgia, Docket No. 6863-U, pages 22 – 24 and Answer of BellSouth Telecommunications, Inc. and Motion to Dismiss Complaint of AT&T Communications of the South Central States, Inc., filed July 2, 2001, Before the Public Service Commission, Commonwealth of Kentucky.

The physical activity to replace the T1 card follows:

- busy out the associated trunks (this had already been done in concert with trouble isolation testing)
  
- physically extract the plug-in card from its mounting slot
  
- physically insert a replacement card and secure in its mounting slot
  
- perform any necessary T1 transmission tests on the T1 carrier system and place test calls to verify call completion over the affected trunks

- REQUEST:** Describe the actions, if any, taken by BellSouth to improve its troubleshooting, inspection, testing processes, and processes for timely resolution to mitigate any future reoccurrences of customer-affecting facilities or network troubles such as the faulty T1 card identified in Interrogatory 175 and dead air problems.
- RESPONSE:** BellSouth has not identified a single process or performance problem in the handling of the trouble tickets associated with the dead air problem. Therefore, there is no action necessary.

**REQUEST:** Describe any actions taken by BellSouth to address the concerns raised by AT&T Broadband as set forth in the May 2, 2001 letter from Denise C. Berger to Jan Burris.

**RESPONSE:** As stated in Mr. Randy Jenkins' letter dated May 24, 2001, in response to Ms. Berger's letter and reiterated in Item 180, there are no actions necessary to be taken. Ms. Berger's "concerns" do not properly state what transpired in the trouble isolation and resolution of the dead air problem.

REQUEST: Identify and describe the actions taken by BellSouth, if any, to investigate and address number portability issues raised in an AT&T letter from Denise C. Berger to Jan Burris dated May 25, 2001.

RESPONSE: See Attached.

**REQUEST:** Identify and describe the circumstances in which BellSouth has rescheduled customer service transitions from BellSouth service to AT&T Broadband service.

**RESPONSE:** BellSouth is not aware of any instances where BellSouth has rescheduled customer service transitions from BellSouth service to AT&T Broadband service. Please see Item 184 for additional information.

**REQUEST:** For any rescheduled customer service transitions identified in Interrogatory No.184, explain the cause for the schedule change, the notice provided to AT&T of the change and the dates and times that the rescheduled customer transitions were originally scheduled and accomplished.

**RESPONSE:** BellSouth assumes AT&T is actually referring to Interrogatory 183 in the above request.

<b>5/29/01</b>	A Letter from Denise Berger, dated 5/25, was received by the Account Team on 5/29 regarding AT&T Insight Customer Problems. This letter was the Account Team's first indication that AT&T was ordering LNP in Kentucky and alleges that "gaps in BellSouth's porting process for residential numbers" is negatively impacting AT&T's customers. <i>See Attached letter</i>
<b>5/29/01</b>	The Account Team verbally advised Denise that its investigation into the cause of the problems detailed by Denise would take longer than the timeframe of June 4, she requested.
<b>6/5/01</b>	BellSouth delivered to AT&T an interim letter dated 6/5 confirming the investigation was underway but incomplete. <i>See attached letter</i>
<b>6/7/01</b>	LCSC and BellSouth Retail Operations notified account team that AT&T was porting numbers incorrectly which was causing end users to receive bills from both AT&T and BellSouth. The BellSouth's Business Office was inundated with calls to stop billing because AT&T was providing their service.
<b>6/7/01</b>	AT&T LSAM (Donna Cain) was advised via phone conversation and e-mail that there were serious problems with its ported numbers in KY due to AT&T porting TNs in KY with a different company code on the SV to NPAC (7606) than the code provided by AT&T on its LSRs (7125). Donna acknowledged that she was aware of the problem, stated that she was surprised we had not contacted her sooner, and asked for a list of the affected TNs. <i>See attached email</i>
<b>6/13/01</b>	AT&T filed its complaint with the KY PSC. The complaint included the 5/25/01 letter from Denise Berger and a copy of the June 5 interim response from the Account Team.  AT&T continued to port numbers incorrectly.
<b>6/15/01</b>	Account Team held conf call w/ AT&T regional VP, Greg Terry, advising that AT&T was porting numbers incorrectly which was creating the double billing problems for AT&T's end users. <i>See attached summary of BellSouth findings.</i>

6/15/01	Account Team received another letter from AT&T identifying additional KY end users it had ported incorrectly who had complained to AT&T about receiving bills from both AT&T and BellSouth. See attached letter
6/19/01	Advised by LCSC and operations that AT&T had begun sending messages to NPAC to change the OCN on the TNs from 7606 to 7125 although AT&T had not yet communicated with the Account Team how it planned to resolve the problem.
6/19/01	Advised AT&T that merely changing OCNS with NPAC was only part of the solution.
6/20/01	AT&T confirms it is changing the codes. Indicates that one misinformed work center representative was causing these errors and that rep had received coaching.
6/21/01	Arranged for LCSC manager to be available to explain additional steps required to resolve number port status and discontinue billing. Asked AT&T to contact LCSC manager to arrange mutually acceptable time on 6/20/01.
6/21/01	Arranged for LCSC manager to be available to explain additional steps required to resolve number port status and discontinue billing. Asked AT&T to contact LCSC manager to arrange mutually acceptable time on 6/20/01.
6/22/01	LCSC manager arrived on shift at 12:00 noon to find VMS from AT&T advising she was late for "scheduled" conference call. AT&T contacted Account team to "get LCSC on the call." AT&T VP complained that BellSouth was not available as "scheduled."
	Later that day LCSC communicated to AT&T that additional LSRs would be required to provide BellSouth authorization to disconnect the numbers. Since majority of LSRs were > 30 days, they were no longer in our system to be processed.
6/23/01	AT&T VP escalated to Account Team VP that AT&T found issuing LSRs to resolve this problem unacceptable and asked the Account Team to identify an alternative solution..
6/25/01	Formal reply to Denise Berger's 5/25/01 letter and Mellony Michaux's letter of 6/15/01 was delivered to AT&T. See Attached letter
6/27/01	Delivered letter to AT&T requesting written authorization to allow BellSouth LCSC to disconnect TNs since AT&T refused to issue LSRs to complete this work. Advised that approx. 8 business days after receipt of authorization, BellSouth would complete the disconnects. See attached letter
7/2/01	Received letter of authorization from AT&T with the 300+ TNs ported in error. Letter referred to situation a BellSouth "billing glitch." See attached letter

7/17/01	Replied to AT&T's June 2 letter with notification that LCSC activity was complete on the numbers provided. <i>See attached</i>
7/18/01	Received call from Mellony Michaux asking BellSouth to tell her how to respond AT&T end users on their billing questions. Account Team has requested assistance from BellSouth's Retail Operations group to field AT&T's questions.
7/24/01	Account Team discussed billing with Mellony Michaux

**REQUEST:** Identify and explain the circumstances in which BellSouth refused to accomplish customer service transitions from BellSouth service to AT&T Broadband service scheduled for Saturday, June 9, 2001.

**RESPONSE:** BellSouth did not refuse to accomplish customer service transitions scheduled for Saturday, June 9, 2001. BellSouth did post Carrier Notification SN91082439, on June 8, 2001, which advised AT&T, and all other CLECs, that due to an unavoidable Emergency Maintenance, the LNP Gateway would be unavailable from June 8, 2001 at 7:00 PM until June 9, 2001 at 9:00 AM EDT. AT&T was not advised that customer service transitions could not be accomplished. The Carrier Notification advised that LNP transactions could not be performed before 9:00 AM on June 9, 2001.

REQUEST: Identify and describe any notice provided to AT&T Broadband regarding BellSouth's refusal to accomplish the scheduled June 9, 2001 customer service transitions.

RESPONSE: Please refer to the response to Item 185.

REQUEST: Identify and explain whether BellSouth provided a revised date for the accomplishment of the scheduled June 9, 2001 customer service transitions.

RESPONSE: Please refer to the response to Item 185.

REQUEST: How many orders does BellSouth require for a CLEC to convert UNE-P which is being used only for voice service to line splitting.

RESPONSE: One. Currently, BellSouth has a manual ordering process available to CLECs for the conversion of UNE-P into the discrete elements necessary to provide an end user data service over the high frequency spectrum of a UNE loop and port, when the CLEC provides its own splitter and DSLAM.

Manual ordering process is available today. Electronic ordering will be available December 2001.

REQUEST: Does BellSouth have business rules that provide information on line splitting? If so, when did BellSouth create the business rules and when were they first available to CLECs?

RESPONSE: Yes. BellSouth has business rules for line splitting. The BellSouth Business Rules for Local Ordering (BBRLO) were made available to CLECs June 29, 2001 as indicated in the BellSouth Carrier Notification SN91082422, dated May 31, 2001 referencing the business rules that may be found at:  
[www.interconnection.bellsouth.com/guides/index.html](http://www.interconnection.bellsouth.com/guides/index.html).

REQUEST: Are Universal Service Order Codes ("USOCs") required to order line splitting? If so, what is the USOC and when did BellSouth create the USOC for line splitting?

RESPONSE: No. CLECs order line splitting by submitting an LSR. Once received, the BellSouth Complex Resale Support Group (CRSG) takes the information contained on the LSR, and based on the information on the existing UNE-P account being converted to line splitting, will enter the appropriate USOCs for the stand alone loop, stand alone port, and the two new collocation cross connects.

REQUEST: Does BellSouth or an entity affiliated with BellSouth provide stand-alone DSL transport to end user residential customers at retail. If so, provide the name of the affiliate or company that provides this service.

RESPONSE: BellSouth does not provide stand-alone DSL transport to end-users. BellSouth DSL requires termination of the DSL circuit on a customer owned or designated ATM circuit within the LATA.

REQUEST: Does BellSouth or any entity affiliated with BellSouth provide stand-alone DSL transport to end-user business customers at retail. If so, provide the name of the affiliate or company that provides this service.

RESPONSE: BellSouth does not provide stand-alone DSL transport to end-users. BellSouth DSL requires termination of the DSL circuit on a customer owned or designated ATM circuit within the LATA

REQUEST: Provide the total number of BellSouth lines for Kentucky, including switched and special access lines.

RESPONSE: The total number of BellSouth lines for Kentucky as of June 30, 2001, including switched and special access is 1,240,097.

**REQUEST:** Provide the total number of CLEC lines for Kentucky.

**RESPONSE:** BellSouth's Method 1 estimate from Victor Wakeling's affidavit as Exhibit CKC-4 in Cindy Cox's testimony in this proceeding reflects BellSouth's conservative estimate of CLEC lines in BellSouth's service area in KY. Please refer to this Exhibit.

REQUEST: Please state the date that BellSouth will begin to provide CLECs with raw data for each of the following reports:

**Ordering**

- a) LNP\_PCT\_Reject\_Interval\_Service\_Requests\_Total\_Mech.txt
- b) LNP\_PCT\_Reject\_Interval\_Service\_Requests\_Partial\_Mech.txt
- c) LNP\_PCT\_Reject\_Interval\_Service\_Requests\_Fully\_Mech.txt
- d) LNP\_Reject\_Interval\_Service\_Requests\_Total\_Mech.txt
- e) LNP\_Reject\_Interval\_Service\_Requests\_Partial\_Mech.txt
- f) LNP\_Reject\_Interval\_Service\_Requests\_Fully\_Mech.txt
- g) LNP\_Firm\_Order\_Confirmation\_Total\_Mech.txt
- h) LNP\_Firm\_Order\_Confirmation\_Partial\_Mech.txt
- i) LNP\_Firm\_Order\_Confirmation\_Fully\_Mech.txt
- j) Note that no LNP Non-Mechanized data is reported in the Ordering reports or raw data files

**Provisioning**

- a) LNP\_Total\_Order\_Cycle\_Time\_Mechanized.txt
- b) LNP\_Total\_Order\_Cycle\_Time\_Mechanized\_with\_Appointment\_codes.txt
- c) LNP\_Percent\_Missed\_Installation\_Appointments.txt
- d) LNP\_Disconnects.txt
- e) Note again that no LNP Non-Mechanized data is reported in the Provisioning reports or raw data files

**Billing**

- a) Invoice Accuracy CLEC (Region)

- b) Mean Time to Deliver Invoices CLEC (Region)
- c) Usage Data Delivery Accuracy CLEC
- d) Usage Timeliness & Completeness CLEC

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 1 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Identify, on an individual measure basis, any and all studies or other documents, that BellSouth has caused to be prepared or possesses that justify and/or explain the differences between its SQM measures and its SEEM measures, including, but not limited to, differences in disaggregation.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 2 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Describe the method(s) and/or procedure(s) BellSouth uses to ensure the accuracy of the error assignment for the flow-through report.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 3 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: For each of the following SEEM sub-measures, list any and all CLEC products and/or services offered by BellSouth that will be aggregated together for comparison with BellSouth's retail data:

- a) Percent Missed Installation Appointments – UNE Loops
- b) Average Completion Interval (OCI) – UNE Loops
- c) % Provisioning Troubles Within 30 Days – UNE Loops
- d) Missed Repair Appointments – UNE Loops
- e) Customer Trouble Report Rate – UNE Loops
- f) Maintenance Average Duration – UNE Loops
- g) Percent Repeat Troubles Within 30 Days – UNE Loops

RESPONSE: Enhancements have been made to the PMAP system to ensure that PARIS has the ability to make improved comparisons with BellSouth's retail data. This change became effective May 2001. The product categories currently used by SEEM are as follows:

- a. Percent Missed Installation Appointments – UNE Loops

(ULP-NDSGN) – UNE 2W Analog Loop Non-Design w/o NP;  
(ULP-DS-ND) - UNE 2W Analog Loop Non-Design w LNP, UNE 2W Analog Loop Non-Design w INP, UNE 2W Analog Loop Design w/o NP, UNE 2W Analog Loop Design w LNP, UNE 2W Analog Loop Design w INP, UNE Other Design;  
(UNE-ISDN) – UNE ISDN w INP, UNE Capable Loop;  
(UDLP<DS1) – UNE Digital Loop;  
(UDLP>=DS1) – UNE DS3 Local Loop, UNE DS1 Local Loop;

- b. Average Completion Interval (OCI) – UNE Loops

(ULP-NDSGN) – UNE 2W Analog Loop Non-Design w/o NP;  
(ULP-DS-ND) - UNE 2W Analog Loop Non-Design w LNP, UNE 2W Analog Loop Non-Design w INP, UNE 2W Analog Loop Design w/o NP, UNE 2W Analog Loop Design w LNP, UNE 2W Analog Loop Design w INP, UNE Other Design;  
(UNE-ISDN) – UNE ISDN w INP, UNE Capable Loop;

(UDLP<DS1) – UNE Digital Loop;  
(UDLP>=DS1) – UNE DS3 Local Loop, UNE DS1 Local Loop;

c. % Provisioning Troubles Within 30 Days – UNE Loops

(ULP-NDSGN) – UNE 2W Analog Loop Non-Design w/o NP;  
(ULP-DS-ND) - UNE 2W Analog Loop Non-Design w LNP, UNE 2W Analog Loop Non-Design w INP, UNE 2W Analog Loop Design w/o NP, UNE 2W Analog Loop Design w LNP, UNE 2W Analog Loop Design w INP, UNE Other Design;  
(UNE-ISDN) – UNE ISDN w INP, UNE Capable Loop;  
(UDLP<DS1) – UNE Digital Loop;  
(UDLP>=DS1) – UNE DS3 Local Loop, UNE DS1 Local Loop;

d. Missed Repair Appointments – UNE Loops

(ULP-NDSGN) – UNE 2W Analog Loop Non-Design w/o NP;  
(ULP-DS-ND) - UNE 2W Analog Loop Non-Design w LNP, UNE 2W Analog Loop Non-Design w INP, UNE 2W Analog Loop Design w/o NP, UNE 2W Analog Loop Design w LNP, UNE 2W Analog Loop Design w INP, UNE Other Design;  
(UNE-ISDN) – UNE ISDN w INP, UNE Capable Loop;  
(UDLP<DS1) – UNE Digital Loop;  
(UDLP>=DS1) – UNE DS3 Local Loop, UNE DS1 Local Loop;

e. Customer Trouble Report Rate – UNE Loops

(ULP-NDSGN) – UNE 2W Analog Loop Non-Design w/o NP;  
(ULP-DS-ND) - UNE 2W Analog Loop Non-Design w LNP, UNE 2W Analog Loop Non-Design w INP, UNE 2W Analog Loop Design w/o NP, UNE 2W Analog Loop Design w LNP, UNE 2W Analog Loop Design w INP, UNE Other Design;  
(UNE-ISDN) – UNE ISDN w INP, UNE Capable Loop;  
(UDLP<DS1) – UNE Digital Loop;  
(UDLP>=DS1) – UNE DS3 Local Loop, UNE DS1 Local Loop;

f. Maintenance Average Duration – UNE Loops

(ULP-NDSGN) – UNE 2W Analog Loop Non-Design w/o NP;

(ULP-DS-ND) - UNE 2W Analog Loop Non-Design w LNP, UNE 2W Analog Loop Non-Design w INP, UNE 2W Analog Loop Design w/o NP, UNE 2W Analog Loop Design w LNP, UNE 2W Analog Loop Design w INP, UNE Other Design;  
(UNE-ISDN) – UNE ISDN w INP, UNE Capable Loop;  
(UDLP<DS1) – UNE Digital Loop;  
(UDLP>=DS1) – UNE DS3 Local Loop, UNE DS1 Local Loop;

g. Percent Repeat Troubles Within 30 Days – UNE Loops

(ULP-NDSGN) – UNE 2W Analog Loop Non-Design w/o NP;  
(ULP-DS-ND) - UNE 2W Analog Loop Non-Design w LNP, UNE 2W Analog Loop Non-Design w INP, UNE 2W Analog Loop Design w/o NP, UNE 2W Analog Loop Design w LNP, UNE 2W Analog Loop Design w INP, UNE Other Design;  
(UNE-ISDN) – UNE ISDN w INP, UNE Capable Loop;  
(UDLP<DS1) – UNE Digital Loop;  
(UDLP>=DS1) – UNE DS3 Local Loop, UNE DS1 Local Loop;

REQUEST: Please provide the standard order interval offered by BellSouth for each of the products/services listed in response to Interrogatory No. 199, sub-measures (a) through (g).

RESPONSE: BellSouth assumes AT&T is actually referring to Interrogatory 198 in the above request.

Please refer to the response to AT&T's First Set of Interrogatories, Item 5 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: List each and every BellSouth product and/or service that is included in each of the following SEEM retail analogs:

- a) Retail Residence and Business
- b) Retail Residence and Business Dispatch
- c) Retail Design

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 6 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: Please specify the standard offered order interval for each of the BellSouth products and/or services identified in response to Interrogatory No. 201.

RESPONSE: BellSouth assumes AT&T is actually referring to Interrogatory 200 in the above request.

Please refer to the response to AT&T's First Set of Interrogatories, Item 7 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: For the months of December 2000, January and February 2001, please state, expressed in percentages and by BellSouth retail analog category, the number of each BellSouth product and/or service sold.

RESPONSE: The table below provides the percentages, by BellSouth retail analog category of each BellSouth product and/or service sold for the months of December 2000, January and February 2001.

<b>Kentucky DATA</b>			
	<b>December</b>	<b>January</b>	<b>February</b>
Residence	91.056%	91.040%	90.372%
Business	7.374%	7.392%	7.939%
PBX	0.108%	0.089%	0.104%
Centrex	0.420%	0.443%	0.350%
ISDN	0.010%	0.006%	0.002%
Design	1.032%	1.031%	1.234%
<b>Total</b>	100.000%	100.000%	100.000%

REQUEST: Please describe in detail BellSouth's procedure(s) for ensuring that its raw data includes all BellSouth and CLEC transactions, and is otherwise accurate.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 9 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Explain with specificity how the product disaggregation for provisioning and maintenance sub-measures specified in BellSouth's SEEM proposal, supports BellSouth's claim that SEEM incorporates "like-to-like" comparisons with BellSouth's retail results.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 10 in Tennessee Regulatory Authority Docket No. 01-00193.

- REQUEST:** Describe BellSouth's process, including raw data collection, systems accessed for data, and report creation, used for assembling the performance measure billing reports. In your description, state what aspects of the process are manual or electronic, and to the extent to which it is manual, whether it is a totally or partially manual process.
- RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 11 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: For each and every measure for which BellSouth provides raw data, please state what data, if any, is excluded from the PMAP raw data files.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 12 and First Request for Production of Documents, Item 1 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** For all sub-measures for which BellSouth is currently providing performance --results, please state the following: BellSouth and CLEC means, BellSouth and CLEC standard deviations, and BellSouth and CLEC sample sizes.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 13 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: For the months of December 2000 through June 2001, what are the average CLEC and BellSouth sample sizes for each SQM sub-measure.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 15 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: In BellSouth's SEEM, within which disaggregation category are LNP standalone performance results reported for the following measures?

- a) Average Completion Interval
- b) Percent Troubles Within 30 Days
- c) Missed Repair Appointment
- d) Customer Trouble Report Rate
- e) Maintenance Average Duration
- f) Repeat Troubles Within 30 Days
- g) FOC Interval
- h) Rejection Interval

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 16 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: In BellSouth's SEEM, within which disaggregation category are LNP with UNE loop performance results reported for the following measures?

- (a) Average Completion Interval
- (b) Percent Troubles Within 30 Days
- (c) Missed Repair Appointment
- (d) Customer Trouble Report Rate
- (e) Maintenance Average Duration
- (f) Repeat Troubles Within 30 Days
- (g) FOC Interval
- (h) Rejection Interval

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 17 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: In BellSouth's SEEM, within which disaggregation category are Switch Ports performance results reported for the following measures?

- a) Average Completion Interval
- b) Percent Troubles Within 30 Days
- c) Missed Repair Appointment
- d) Customer Trouble Report Rate
- e) Maintenance Average Duration
- f) Repeat Troubles Within 30 Days
- g) Percent Missed Appointments
- h) FOC Interval
- i) Rejection Interval

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 18 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: In BellSouth's SEEM, within which disaggregation category are Transport performance results reported for the following measures?

- a) Average Completion Interval
- b) Percent Troubles Within 30 Days
- c) Missed Repair Appointment
- d) Customer Trouble Report Rate
- e) Maintenance Average Duration
- f) Repeat Troubles Within 30 Days
- g) Percent Missed Appointments

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 19 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: In BellSouth's SEEM, within which disaggregation category are EEL performance results reported for the following measures?

- a) Average Completion Interval
- b) Percent Troubles Within 30 Days
- c) Missed Repair Appointment
- d) Customer Trouble Report Rate
- e) Maintenance Average Duration
- f) Repeat Troubles Within 30 Days
- g) Percent Missed Appointments
- h) FOC Interval
- i) Rejection Interval

RESPONSE: EEL data is not captured in SEEM.

**REQUEST:** Please provide all information on test responsiveness results used by BellSouth in the development of its benchmark for the Loop Make Inquiry –Electronic measure.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 21 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Describe each and every step of the process by which data flows from the CLEC to receipt of a response by the CLEC for the OSS Response Interval Measure and identify what portion of the data flow process is included in the time captured for this measure by BellSouth.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 22 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Describe each and every step of the process by which data flows from the CLEC to receipt of a response by the CLEC for the FOC Timeliness Measure and identify what portion of the data flow process is included in the time captured for this measure by BellSouth.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 23 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Describe each and every step of the process by which data flows from the CLEC to receipt of a response by the CLEC for the Reject Interval Measure and identify what portion of that flow is included in the time captured for this measure by BellSouth.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 24 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Describe each and every step of the process by which data flows from the CLEC to the receipt of a response by the CLEC for the Completion Notice Interval Measure and identify what portion of that flow is included in the time captured for this measure by BellSouth.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 25 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: With respect to the Pre-Order Order Interface Availability measure, please state whether BellSouth considers it an outage if the CLEC interface, i.e. LENS, EDI, TAG is down, but the legacy systems are functionally available?

RESPONSE: BellSouth reports full outages of the CLEC interfaces, i. e., LENS, EDI, TAG, even if the legacy systems are functionally available.

**REQUEST:** Describe the actions taken by BellSouth to disconnect telephone numbers in the central office switch following the receipt of an activate message indicating the porting of a number by a CLEC.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 28 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: For the database update interval measure, indicate whether the "date and time stamp when a service order is completed" noted in the business rules is for a "CP" completion or a "CPX" completion.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 29 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Describe in detail BellSouth's process for obtaining a statistically valid sample of CLEC orders for the Percent (%) Database Update Accuracy measure.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 30 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Identify and describe the methods by which BellSouth captures, tracks, and reports problems with NPA/NXX activation and their resolution.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 31 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Identify the BellSouth SQM measure(s) that include the time interval for completion of xDSL loop conditioning and describe in detail the start and stop times of the interval, and any information or request types excluded from the interval.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 32 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: Please identify each of BellSouth's LCSC locations that are included in the Speed of Answer in Ordering Center Measure.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 33 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Please describe any differences in the data included in the LSR's in the denominator of the Percent LSRs total mechanized measure, and the LSRs included in the "LSRs submitted" in the flow-through report.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 34 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Please describe any differences in the data included in the LSRs in the fully mechanized rejections measure and the LSRs in the auto-clarifications of the flow-through report.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 35 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: Please describe any differences in the data included in the LSRs in the partially mechanized rejections measure and the LSRs included in the "CLEC caused fallout" of the flow-through report.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 35 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Please describe any differences in the data included in the LSRs in the fully mechanized FOCs measure and the LSRs included in the "Issued Service Orders" of the flow-through report.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 37 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Please describe any differences in the completed orders used in the calculation of the missed appointment metric and the completed orders used in the calculation of the completion notice measure.

**RESPONSE:** The Missed Appointment metric measures all completed orders with the exception of exclusions for: Disconnects, BellSouth or CLEC record/administrative orders, and end user missed appointments on Interconnection Trunk Orders.

The Completion Notice Measure has the same exclusions and will measure the same completed orders.

**REQUEST:** Please describe any differences in the completed orders used in the calculation of the Missed appointments – LNP measure and the completed orders in the calculation of the LNP Disconnect Timeliness measure.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 39 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Please describe any differences in the completed orders used in the calculation of the Missed Appointments UNE with LNP metric and the completed orders used in the calculation of the Hot Cut Timeliness measure.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 40 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Describe in detail the process BellSouth uses to track and report performance results for coordinated customer conversions (loops with and without number portability).

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 41 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: Identify all supporting documentation that references or discusses the process. BellSouth uses to track and report performance results for coordinated customer conversions (loops with and without number portability).

RESPONSE: Please refer to the response to AT&T's First Request for Production of Documents, Item 2, Attachment 1 (the attachment is Proprietary and will be provided subject to the Nondisclosure Agreement).

**REQUEST:** With respect to the Coordinated Hot Cut Timeliness % Within Interval Measure, please provide all performance data, studies, or other information that support the benchmark of 95% within 4 hours window for IDLC loops.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 43 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: For the months of January 2001 through June 2001, please state, by month, the percentage of coordinated cutovers in Kentucky that involved IDLC.

RESPONSE: This information is stored in WFA and is only retained for a short period of time. The only data available at this time is from April to present. During the period from April through June there were 21 coordinated cutovers of which 2 involved IDLC. That percentage of cutovers involving IDLC was therefore 9.5% for that period of time.

**REQUEST:** For the months of January 2001 through June 2001, please state the number and percentage of coordinated customer conversion service orders in Kentucky involving IDLC for which BellSouth failed to meet the Coordinated Hot Cut Timeliness % Within Interval Measure.

**RESPONSE:** As discussed in Item 236, there were only 2 conversions involving IDLC and both were met on time. Therefore, 0% failed to meet the Coordinated Hot Cut Timeliness % Within Interval Measure.

**REQUEST:** Describe in detail the carrier notifications that are included in BellSouth's change control measures and the carrier notifications that are excluded from BellSouth's change control measures.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 46 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Describe in detail the documentation releases that are included in BellSouth's change control measures and the documentation releases that are excluded from BellSouth's change control measures.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 47 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: Please state the average interval by which BellSouth initiates local service for a new retail customer through the "win-back" process via loop cut-overs performed in the central office.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 48 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Beginning with January 1, 2001, provide the service order accuracy rate for CLEC orders and the service order accuracy rate for BellSouth's retail operation for Kentucky. For purposes of this interrogatory, "service order accuracy rate" with respect to CLEC orders is defined as the percentage of service orders for CLECs that were processed by BellSouth exactly as they were ordered or prepared by the CLECs.

**RESPONSE:** BellSouth objects to this interrogatory on the ground that it is unduly burdensome and oppressive. BellSouth does not mechanically record, on a historical basis, whether the local service requests (LSR) submitted by the CLECs were processed exactly as submitted or whether some change was necessitated. The only way to ascertain the answer to this question would be to go back and find the local service request submitted by the CLEC and then compare it to the service order that was issued, which would have to be done manually, if it could be done at all for the period requested. BellSouth is in the process of developing a regional Service Order Accuracy report, which will analyze a statistically valid sample of the orders produced in the regional centers for all CLEC requests. This report will be available by the end of August 2001.

REQUEST: Please describe in detail BellSouth's rationale for the 85% met benchmarks for the Percent Flow through Service Requests measure.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 50 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: Explain why "D" orders associated with LNP Standalone Orders are not excluded from the Average Order Completion Interval measure.

RESPONSE: There are a minimum of two orders necessary for the LNP Standalone product, a "C" order is issued to notify the downstream systems that the number is being ported and a disconnect order, "C" or "D" order, which disconnects the number from the BST records, completing the provisioning process and unlocking the E911 records. The clock starts when a valid "D" or "C" order is assigned in SOCS and stops when the system completes the "D" or "C" order in SOCS, therefore, the "D" and/or "C" order must be counted.

**REQUEST:** For each SQM measure, describe the source of the data used to calculate the performance measurement results, e.g. LESOG, SOCs, etc.

**RESPONSE:** This is a duplicate request to Interrogatory 55; please see BellSouth's response to Item 55.

REQUEST: Please describe BellSouth's rationale for excluding from its Held Order Interval Measure those orders that were held during the month, but were completed by the end of the month.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 53 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** For each measure, describe the data that is stored or otherwise placed in BARNEY. If data for a measure is not stored or otherwise placed in BARNEY, please identify the database or system where such information is stored or otherwise placed.

**RESPONSE:** This is a duplicate request to Interrogatory 56; please see BellSouth's response to Item 56.

REQUEST: Please identify all systems that feed information and/or data into PARIS.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 55 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: Please describe the type information that is feed into and/or retained in PARIS.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 56 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: Please describe in detail how data used to support BellSouth's SQM and SEEM plan is collected and stored.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 57 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** For each measure in BellSouth's SQM, describe whether the data specified as excluded in BellSouth's SQM is also excluded from the raw data provided to CLECs.

**RESPONSE:** The CLEC records/items listed as exclusions in the BellSouth SQM are normally included in the raw data files and must be excluded to replicate the reports. The exceptions are cancelled orders in Average Order Completion Interval (OCI) and Average Completion Notice Interval (ACNI).

REQUEST: Describe in detail BellSouth's procedure(s) for ensuring that its raw data includes all BellSouth and CLEC transactions, and is otherwise accurate.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 59 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: Provide a SEEM report for AT&T data for February 2001 results, including payment amounts that would be due, if any, including all back-up detail. If results are not available for all measures, please provide a report on those measures for which data is available.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 60 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: Provide BellSouth's basis for excluding appointments missed subsequent to the original committed due date from its Percent Missed Appointments measure.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 61 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: For the months of January 2001 through June 2001, please provide the following information for each SEEM measure described below:

Measure	For CLEC Service Orders	For CLEC Service Orders	For BST Retail Analog Service Orders	For BST Retail Analog Service Orders
	% Field Dispatch	% Central Office Dispatch	% Field Dispatch	% Central Office Dispatch
Average Completion Interval/UNE Loops				
% Missed Installation Appointments/UNE loops				
Maintenance Avg. Duration/UNE Loops				
% Provisioning Troubles within 30 Days/UNE Loops				

RESPONSE: BellSouth Response:

For these SEEM measurements, the BST Retail Analog is Residence and Business Dispatch, or stated another way, "Field Dispatch." Central Office Dispatch is included in the BellSouth category of Non Dispatch. Since Non Dispatch is not the retail analog for these measurements in SEEM, its percentage will be shown as zero. The following tables list the % Field Dispatch and % Central Office Dispatch for CLEC Service Orders for January 2001 through May 2001. June 2001 data is not currently available.

RESPONSE: (Cont'd)

**January Results**

Measure	For CLEC Service Orders	For CLEC Service Orders	For BST Retail Analog Service Orders	For BST Retail Analog Service Orders
	% Field Dispatch	% Central Office Dispatch	% Field Dispatch	% Central Office Dispatch
Average Completion Interval/UNE Loops	100	0	100	0
% Missed Installation Appointments/UNE loops	100	0	100	0
Maintenance Avg. Duration/UNE Loops	69	31	100	0
% Provisioning Troubles within 30 Days/UNE Loops	100	0	100	0

RESPONSE: (Cont'd)

**February Results**

Measure	For CLEC Service Orders	For CLEC Service Orders	For BST Retail Analog Service Orders	For BST Retail Analog Service Orders
	% Field Dispatch	% Central Office Dispatch	% Field Dispatch	% Central Office Dispatch
Average Completion Interval/UNE Loops	100	0	100	0
% Missed Installation Appointments/UNE loops	100	0	100	0
Maintenance Avg. Duration/UNE Loops	80	20	100	0
% Provisioning Troubles within 30 Days/UNE Loops	100	0	100	0

RESPONSE: (Cont'd)

**March Results**

Measure	For CLEC Service Orders	For CLEC Service Orders	For BST Retail Analog Service Orders	For BST Retail Analog Service Orders
	% Field Dispatch	% Central Office Dispatch	% Field Dispatch	% Central Office Dispatch
Average Completion Interval/UNE Loops	100	0	100	0
% Missed Installation Appointments/UNE loops	100	0	100	0
Maintenance Avg. Duration/UNE Loops	65	35	100	0
% Provisioning Troubles within 30 Days/UNE Loops	100	0	100	0

RESPONSE: (Cont'd)

**April Results**

Measure	For CLEC Service Orders	For CLEC Service Orders	For BST Retail Analog Service Orders	For BST Retail Analog Service Orders
	% Field Dispatch	% Central Office Dispatch	% Field Dispatch	% Central Office Dispatch
Average Completion Interval/UNE Loops	100	0	100	0
% Missed Installation Appointments/UNE loops	100	0	100	0
Maintenance Avg. Duration/UNE Loops	80	20	100	0
% Provisioning Troubles within 30 Days/UNE Loops	100	0	100	0

RESPONSE: (Cont'd)

**May Results**

Measure	For CLEC Service Orders	For CLEC Service Orders	For BST Retail Analog Service Orders	For BST Retail Analog Service Orders
	% Field Dispatch	% Central Office Dispatch	% Field Dispatch	% Central Office Dispatch
Average Completion Interval/UNE Loops	100	0	100	0
% Missed Installation Appointments/UNE loops	97	3	100	0
Maintenance Avg. Duration/UNE Loops	65	35	100	0
% Provisioning Troubles within 30 Days/UNE Loops	100	0	100	0

REQUEST: Please provide the January 2001 through June 2001 monthly performance results for the "ADSL provided to retail" analog included in BellSouth's proposed SQM.

- a. Average Completion Notice Interval
- b. Average Jeopardy Notice Interval
- c. % Missed Installation Appointments
- d. Missed Repair Appointments
- e. Maintenance Average Duration
- f. % Troubles within 30 Days

RESPONSE:

**Kentucky**

<b>ADSL provided to retail</b>			
<b>January</b>	<b>Result</b>	<b>April</b>	<b>Result</b>
Average Completion Notice Interval	N/A	Average Completion Notice Interval	N/A
Average Jeopardy Notice Interval	N/A	Average Jeopardy Notice Interval	N/A
% Missed Installation Appointments	100.00%	% Missed Installation Appointments	6.93%
Missed Repair Appointments	25.24%	Missed Repair Appointments	23.19%
Maintenance Average Duration	25.1 Hrs	Maintenance Average Duration	18.33 Hrs
% Repeat Troubles within 30 days	1.94%	% Repeat Troubles within 30 days	3.62%
<b>February</b>	<b>Result</b>	<b>May</b>	<b>Result</b>
Average Completion Notice Interval	N/A	Average Completion Notice Interval	0.64 days
Average Jeopardy Notice Interval	N/A	Average Jeopardy Notice Interval	N/A
% Missed Installation Appointments	66.67%	% Missed Installation Appointments	3.26%
Missed Repair Appointments	12.70%	Missed Repair Appointments	10.78%
Maintenance Average Duration	12.06 Hrs	Maintenance Average Duration	N/A
% Repeat Troubles within 30 days	0.00%	% Repeat Troubles within 30 days	22.55%
<b>March</b>	<b>Result</b>		
Average Completion Notice Interval	N/A		
Average Jeopardy Notice Interval	N/A		
% Missed Installation Appointments	2.88%		
Missed Repair Appointments	19.01%		
Maintenance Average Duration	20.59 Hrs		
% Repeat Troubles within 30 days	0.00%		

**REQUEST:** Describe and identify any and all analysis BellSouth has conducted on the pay-outs that would have been required of BellSouth for the months of January 2001 and February 2001 based on the remedy plan proposed by BellSouth.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 64 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Describe and identify any and all correlation studies and/or documents that BellSouth possesses or has caused to be prepared to justify its exclusion of measures from its remedies plan.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 65 in Tennessee Regulatory Authority Docket No. 01-00193.

**REQUEST:** Provide all formulas required to compute the balancing critical value for proportion measures and please provide in an Excel spreadsheet, a numerical example illustrating the necessary computations.

**RESPONSE:** Please refer to the response to AT&T's First Set of Interrogatories, Item 68 in Tennessee Regulatory Authority Docket No. 01-00193.

REQUEST: Please provide the BellSouth mean and standard deviation for installation intervals of residential lines requiring dispatch.

RESPONSE: Please refer to the response to AT&T's First Set of Interrogatories, Item 69 in Tennessee Regulatory Authority Docket No. 01-00193.